



**Homeland
Security**

Privacy Office, Mail Stop 0655

September 3, 2019

SENT VIA E-MAIL TO: foia@americanoversight.org

Austin R. Evers
Executive Director
American Oversight
1030 15th Street, NW
Suite B255
Washington, DC 20005

Re: **19-cv-10916**
ACLU of Massachusetts, et. al v. DHS

Dear Mr. Evers:

This letter constitutes the final response to your Freedom of Information Act (FOIA) request to the Department of Homeland Security (DHS), which you submitted on March 11, 2019. Your FOIA request sought a copy of the Border Security Plan that DHS submitted to Congress in December 2018. As you are aware, this FOIA request is now the subject of litigation in the U.S. District Court for the District of Massachusetts.

Upon receipt of your FOIA request, our office conducted a search of the DHS Office of the Executive Secretariat. That search located an 86-page document titled "Fiscal Year 2018 Border Security Improvement Plan."

After review of the document, DHS determined that it consisted of information under the purview of U.S. Customs and Border Protection (CBP), and referred the record to CBP for consultation. After review, CBP determined that portions of the document would be withheld pursuant to FOIA Exemption (b)(7)(E).

CBP applied FOIA Exemption (b)(7)(E) to law enforcement techniques and procedures, as well law enforcement sensitive information pertaining to specific vulnerabilities and security risks present at the border contained within the records. The release of this information could jeopardize CBP's law enforcement mission by providing a road map allowing the same potential aggressors the plan was intended to combat to circumvent the law by exploiting the vulnerabilities it identifies.

If you have any questions regarding this release, please contact Assistant U.S. Attorney Michael Sady, United States Attorney's Office, District of Massachusetts, by email at Michael.Sady@usdoj.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Bradley E. White". The signature is fluid and cursive, with the first name "Bradley" and last name "White" clearly distinguishable.

Bradley E. White
(Acting) Director, FOIA Litigation

Enclosure: 1 PDF, 86 pages

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Fiscal Year 2018 Border Security Improvement Plan

December 21, 2018

Fiscal Year 2018 Report to Congress



Homeland
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BSIP-001

DHS-19-0341-A-000001

Message from the Secretary

December 21, 2018

I am pleased to submit the following report, "Fiscal Year 2018 Border Security Improvement Plan," which has been prepared by U.S. Customs and Border Protection (CBP).

This report was compiled pursuant to the legislative language set forth in the Fiscal Year (FY) 2018 Department of Homeland Security (DHS) Appropriations Act (P.L. 115-141) and its accompanying Joint Explanatory Statement. The report provides a risk-based plan for improving security along the borders of the United States, including the use of personnel, fencing, other forms of tactical infrastructure, and technology.

Pursuant to congressional requirements, this report is being provided to the following Members of Congress:

The Honorable Kevin Yoder
Chairman, House Appropriations Subcommittee on Homeland Security

The Honorable Lucille Roybal-Allard
Ranking Member, House Appropriations Subcommittee on Homeland Security

The Honorable Shelley Moore Capito
Chairman, Senate Appropriations Subcommittee on Homeland Security

The Honorable Jon Tester
Ranking Member, Senate Appropriations Subcommittee on Homeland Security

I would be pleased to respond to any questions you may have. Please do not hesitate to contact my office at (202) 282-8203.

Sincerely,



Kirstjen M. Nielsen
Secretary
U.S. Department of Homeland Security



Executive Summary

The 2018 Border Security Improvement Plan (BSIP) was developed pursuant to the language set forth in the FY 2018 DHS Appropriations Act (P.L. 115-141) and its accompanying Joint Explanatory Statement, which require the Secretary of Homeland Security to “submit to the Committees on Appropriations of the Senate and the House of Representatives a risk-based plan for improving security along the borders of the United States, including the use of personnel, fencing, other forms of tactical infrastructure, and technology.”

The 2018 BSIP builds upon the framework established in the 2017 BSIP. The 2017 BSIP was developed by CBP and signed by Secretary Kirstjen M. Nielsen on January 4, 2018. It was created pursuant to the legislative language set forth in the FY 2017 DHS Appropriations Act (P.L. 115-31). The 2017 BSIP created a framework for CBP to analyze and prioritize initiatives to improve border security. This framework is based on three fundamental goals and their associated objectives:

Goal 1: Enhance understanding of border threats and risks	Goal 2: Strengthen enforcement operations at the border	Goal 3: Lead a resilient network of border enforcement capabilities
<ul style="list-style-type: none">• Objective 1: Increase situational awareness• Objective 2: Advance risk management in decision making• Objective 3: Identify and counter criminal and terrorist organizations and networks	<ul style="list-style-type: none">• Objective 1: Expand operational readiness• Objective 2: Enhance impedance and denial of illegal border crossings• Objective 3: Ensure agility for appropriate and timely law enforcement responses	<ul style="list-style-type: none">• Objective 1: Expand information and intelligence sharing partnerships• Objective 2: Increase ability to address border security risks as early as possible• Objective 3: Strengthen coordinated border enforcement globally

Ultimately, security of our national borders is a national security issue that is among the most vital elements of the Nation’s economic and physical well-being. CBP is the leading law enforcement agency responsible for border security. CBP recognizes that actions taken pursuant to the 2017 BSIP and other border security-related plans have an impact on the effectiveness of the tactics, techniques, and procedures used by our adversaries in attacking our borders. Thus, CBP will use the framework established in the 2017 BSIP to enhance continuously its approach to border security, addressing the constantly evolving threats and challenges of the border environment.

CBP's comprehensive and agile approach to delivering the highest level of border security is built around the three foundational elements of border security:

- Knowing what is happening in the border environment,
- Having the ability to act or respond to that knowledge, and
- Cultivating partnerships that enhance knowledge and the ability to act.

CBP will use these foundational elements, analysis of the ever-changing information on the border threat landscape, and a framework of goals and objectives to refine and optimize continuously its investment strategies.



Fiscal Year 2018 Border Security Improvement Plan

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I. Legislative Language

This document was compiled pursuant to legislative language set forth in the Fiscal Year (FY) 2018 Department of Homeland Security (DHS) Appropriations Act (P.L. 115-141) and its accompanying Joint Explanatory Statement.

P.L. 115-141 states:

SEC. 231. (a) Not later than 180 days after the date of the enactment of this Act, the Secretary shall submit to the Committees on Appropriations of the Senate and the House of Representatives a risk-based plan for improving security along the borders of the United States, including the use of personnel, fencing, other forms of tactical infrastructure, and technology, to include—

- (1) A statement of goals, objectives, activities, and milestones for the plan.
- (2) A detailed implementation schedule for the plan with estimates for the planned obligation of funds for fiscal years 2019 through 2027 that are linked to the milestone-based delivery of specific—
 - (A) capabilities and services;
 - (B) mission benefits and outcomes;
 - (C) program management capabilities; and
 - (D) lifecycle cost estimates.
- (3) A description of the manner in which specific projects under the plan will enhance border security goals and objectives and address the highest priority border security needs.
- (4) An identification of the planned locations, quantities, and types of resources, such as fencing, other physical barriers, or other tactical infrastructure and technology, under the plan.
- (5) A description of the methodology and analyses used to select specific resources for deployment to particular locations under the plan that includes—
 - (A) analyses of alternatives, including comparative costs and benefits;
 - (B) an assessment of effects on communities and property owners near areas of infrastructure deployment; and
 - (C) a description of other factors critical to the decision making process.
- (6) An identification of staffing requirements under the plan, including full-time equivalents, contractors, and detailed personnel, by activity.
- (7) A description of performance metrics for the plan for assessing and reporting on the contributions of border security capabilities realized from current and future investments.
- (8) A description of the status of the actions of the Department of Homeland Security to address open recommendations by the Office of Inspector General and the Government Accountability Office relating to border security, including

plans, schedules, and associated milestones for fully addressing such recommendations.

(9) A plan to consult State and local elected officials on the eminent domain and construction process relating to physical barriers;

(10) An analysis, following consultation with the Secretary of the Interior and the Administrator of the Environmental Protection Agency, of the environmental impacts, including on H. R. 1625—271 wildlife, of the construction and placement of physical barriers planned along the Southwest border, including in the Santa Ana National Wildlife Refuge; and

(11) Certifications by the Under Secretary of Homeland Security for Management, that—

(A) the plan has been reviewed and approved in accordance with an acquisition review management process that complies with capital planning and investment control and review requirements established by the Office of Management and Budget, including as provided in Circular A-11, part 7; and

(B) all activities under the plan comply with Federal acquisition rules, requirements, guidelines, and practices.

(b) The Secretary shall concurrently submit the plan required in subsection (a) to the Comptroller General of the United States, who shall evaluate the plan and report to the Committees on Appropriations of the Senate and the House of Representatives on the strengths and weaknesses of such plan not later than 120 days after receiving such plan.

The Joint Explanatory Statement includes the following:

Sec. 231. A new provision is included requiring the Secretary to submit a risk-based plan for improving security along the borders of the United States.

For Official Use Only (FOUO) Classification

Pursuant to DHS Management Directive 11042.1, Safeguarding Sensitive but Unclassified (For Official Use Only) Information, this report in its entirety is classified FOUO because it aligns with exemption (a): “Information of the type that may be exempt from disclosure per 5 U.S.C. § 552, Freedom of Information Act, and its amendments” and exemption (b): “Information exempt from disclosure per 5 U.S.C. § 552a, Privacy Act” of the Directive.

II. Background

A. Border Security

Securing America's borders is an essential element to promoting economic prosperity and physical security for our citizens. Our borders present unique challenges because the border is a complex environment with a diverse array of constantly and rapidly evolving threats. Some of these threats and challenges include terrorism, transnational crime, illegal immigration, counterfeit and unsafe goods, agricultural pests and diseases, narcotics smuggling, human trafficking, and the outbound transfer of prohibited weapons and illicit bulk currency.

Security of our Nation's borders is a critical mission for DHS, and it is a mission based on three foundational elements:

- Knowing what is happening in the border environment,
- Having the ability to act or respond to that knowledge, and
- Cultivating partnerships that enhance knowledge and the ability to act.

These three elements form the foundation of all strategies and activities across the Department's Border Security Enterprise. Increasing our capabilities and capacity in these three areas improves DHS's security posture along our borders.

1. DHS Border Security Enterprise

DHS leads a broad network of border security capabilities across the Federal Government and beyond. Security of our borders cannot be managed as a finite perimeter, but must include a system of layers of security that start beyond our borders and extend to the interior of the United States. The array of border security capabilities employed by DHS and our federal, state, local, tribal, and international partners enables a holistic approach to preventing the illegal entry of people, drugs, and goods across the Southern Border, Northern Border, and the maritime approaches to our shores.

The following are some of the major capabilities and activities employed by DHS in its layered approach to border security:

International Engagement: Effective border security begins in source and transit countries. Substantial, sustained success requires cooperation with federal partners, foreign governments, and other international partners to prevent illegal pathways and networks that fuel violence and corruption. Building cooperative and mutually beneficial security relationships also will facilitate the legitimate flow of people and goods. Working with the U.S. Department of State (DOS)—which leads U.S. international engagement—DHS supports U.S. efforts to promote

source country economic development and political stability, to negotiate agreements to achieve joint policy goals, and to issue visas for eligible applicants who seek a lawful pathway for entry into the United States, among other activities. This international engagement includes law enforcement capacity development in both source and transit countries.

Throughout the world, and particularly in the Western Hemisphere, DHS implements:

- training courses;
- capacity-building programs;
- information-sharing activities;
- joint operations with partners in law enforcement, aviation security, customs regulation, border enforcement, cybersecurity, and countering violent extremism; and
- humanitarian support related to mass migrations, trafficking in persons, and emergency response.

Additionally, DOS and DHS jointly strive to negotiate removal agreements, necessary for the repatriation of aliens subject to final removal orders, from both willing and recalcitrant source countries. In fact, DOS has granted DHS authority to enter into agreements with other nations as the Department seeks improved operational integration and coordinated interdiction of illicit drug smuggling and other illegal activities.

Transnational Criminal Organization (TCO) Dismantlement: Reducing transnational organized crime and associated illegal activities are key elements of the plan to improve border security. TCOs vary widely in their size and nature; ranging from large, diversified cartels, such as the Sinaloa Cartel, to small, specialized organizations focused on a specific area or function. Specific types of TCOs include drug trafficking organizations (DTO) and alien smuggling organizations (ASO). DTOs are typically large, complex organizations with highly defined command and control structures that produce, transport, and distribute large quantities of one or more drugs. ASOs, in contrast, are typically smaller organizations that operate separately or independently from, but under the jurisdiction of, larger TCOs controlling specific territories.

Countering these TCOs is a national security priority for the Administration, and a major focus of DHS's efforts to improve border security. Working with its partners, (b) (7)(E)

(b) (7)(E)

Border Enforcement: DHS apprehends or arrests potentially removable aliens, criminals, and suspected terrorists and interdicts dangerous and illicit goods while facilitating lawful trade and travel. The Southern Border and approaches and the Northern Border are vast and encompass diverse geographic regions cutting across domains, jurisdictions, international boundaries, and enforcement activities. Given this complex environment, direct enforcement of U.S. laws is

challenging and requires cooperation from a wide range of federal agencies and international partners, as well as support from state and local law enforcement partners. Law enforcement activities within the Southern Border and approaches and the Northern Border are the foundation of border security and represent the largest investment of DHS resources. U.S. Customs and Border Protection (CBP), U.S. Coast Guard, and U.S. Immigration and Customs Enforcement (ICE) are the primary law enforcement agencies responsible for border enforcement.

Consequence Delivery System: Under Section 8 of the U.S. Code, it remains a crime to enter into the United States at a location other than a designated port of entry (POE). Border security requires imposing consequences on illegal border crossers, traffickers, and smugglers, along with timely adjudication of applications for relief. (b) (7)(E)

(b) (7)(E)

(b) (7)(E) In addition to imposing administrative consequences (removal), criminal consequences such as federal prosecution are also necessary to deter repeat offenders from continued illegal entry attempts. Apprehended illegal aliens may apply for lawful immigration benefits (asylum or other forms of relief, including protection from removal), but these applications must be adjudicated thoroughly to ensure that benefits are granted only to those who meet legal eligibility standards, while preventing the exploitation of immigration benefits by those who seek entry through fraud and deception.

Working with its partners, DHS imposes a range of consequences on aliens arrested for attempting illegal entry across our borders. The systematic delivery of consequences is most developed in the land domain between POEs through the U.S. Border Patrol (USBP) Consequence Delivery System. Although these consequences involve border apprehensions by DHS, the application of these consequences relies both on DHS and Federal Government partners at the U.S. Department of Justice, including the Executive Office for U.S. Attorneys, the U.S. Marshals Service, the Executive Office for Immigration Review, and the Federal Bureau of Prisons.

Interior Enforcement: Resilient border security also relies heavily on DHS's ability to enforce immigration laws within the interior of the United States. Effective interior enforcement must eliminate the expected benefit of illegally entering, or illegally remaining longer than permitted, in the United States, which, in turn, will deter other aliens from attempting to enter the United States illegally or from overstaying their authorized period of stay. The motivation of these illegal aliens varies and include higher wages, family reunification, quality of life, and criminal gain. Furthermore, some illegal aliens are able to illegally gain employment without verification of employment eligibility by employers, or by presenting fraudulent documents to employers who comply with the Immigration and Nationality Act requirements.

ICE is the primary law enforcement agency engaged in a wide range of interior enforcement activities to counter and deter illegal immigration to the United States. ICE identifies, arrests,

detains, and removes, from the interior, aliens who either overstayed or entered the country illegally. Specific activities include worksite enforcement; identification and removal of incarcerated criminal aliens; criminal and gang investigations; and partnerships with state and local law enforcement through programs such as 287(g) and Secure Communities. Holding employers accountable for employment eligibility verification is another important, effective element of reducing the incentive to cross our borders illegally.

This document will focus on the efforts of CBP, within this broader context, to enforce the Nation's laws and regulations and to ensure secure control of our Nation's borders, both between and at the POEs.

2. U.S. Customs and Border Protection

CBP is the leading law enforcement agency responsible for border security. In this role, CBP manages approximately 6,000 miles of land border and 95,000 miles of shoreline, while also preventing the illegal movement of people and contraband crossing into U.S. airspace. CBP is also responsible for managing the flow of lawful trade and travel through 328 air, land, and maritime POEs.

CBP Mission Statement

To safeguard America's borders thereby protecting the public from dangerous people and materials while enhancing the Nation's global economic competitiveness by enabling legitimate trade and travel.

CBP Vision Statement

To serve as the premier law enforcement agency enhancing the Nation's safety, security, and prosperity through collaboration, innovation, and integration.

Border security is one of CBP's primary missions and is a priority of the highest order. CBP's experience has shown that effective border security must employ an optimized resource allocation strategy that leverages the capabilities of multiple tools, material resources, and people. CBP constantly seeks to enhance its ability to address the three foundational elements of achieving border security: knowledge of the border environment; ability to act on that knowledge; and partnerships that increase knowledge or strengthen action.

CBP increases its knowledge of the border environment through several means, including, but not limited to: information sharing with law enforcement partners, use of advance information to

identify high-risk passengers and cargo, observation by personnel in border regions, sensor technology, infrastructure, tactical/strategic communications, and intelligence.

Personnel are the primary resource needed to secure our borders, but the ability to respond effectively can be improved through other resources such as: timely, actionable, and relevant intelligence; targeting and analytical systems; biometric identification technology; wall and other physical barriers; border access roads; sensor technology; aircraft, boats, and various types of vehicles; and modern tactical communications infrastructure. Impedance and denial barriers, such as walls and other tactical infrastructure, are essential components of CBP's tactical response along the border; such barriers simultaneously block illegal entry into the United States while also channeling those who would attempt illegal entry into areas where agents can apprehend, detain, and remove them more easily.

Although walls and other tactical infrastructure are the cornerstone of an effective border security strategy, (b) (7)(E) provide agents with additional critical knowledge of the movement of illegal persons and goods. (b) (7)(E)

(b) (7)(E)
(b) (7)(E) A personnel-only approach to border security is generally cost-prohibitive when compared with more thorough, integrated designs that augment personnel with infrastructure, technology, and other resources. That said, the hiring of additional Border Patrol Agents (BPA) to support response and resolution remains a critical capability for CBP. Likewise, an approach that is overly reliant on technology dramatically reduces the ability of agents to impede and interdict the entrance of illegal border crossers into the United States effectively. (b) (7)(E)
(b) (7)(E) In all, then, it is only through the effective utilization of a border security system comprising physical barriers, increased personnel, improved infrastructure, and cutting-edge technology that border security can be realized.

3. Border Security Challenges and Opportunities

The constantly evolving and shifting threats and challenges in the border environment require CBP to maintain a level of adaptability that allows the agency to employ the correct mix of tools, resources, and techniques to secure our borders effectively. CBP's experience has shown that actions taken along the border invariably will generate a reaction from those looking for gaps and seams in our security. (b) (7)(E)

(b) (7)(E)
This action-reaction effect will continue to occur, driving changes to the operating environment. Additionally, new threats and challenges will appear when technological advances, geopolitical changes, economic crises, and other factors affect the international community.

A combination of infrastructure, legislative, and partnership solutions are required to address these dynamic challenges. First, continued investment in a border wall system is essential as it provides agents with the ability to impede and/or deny attempted illegal entries while creating additional time to carry out a law enforcement resolution. (b) (7)(E)

(b) (7)(E)

The construction of both new and replacement wall system that incorporates complementary technology and roads is a critical component of USBP's pursuit of operational control of the Southwest Border (SWB).

In addition, CBP remains committed to working with U.S. government partner agencies as well as with the governments of Mexico, Honduras, Guatemala, and El Salvador in identifying and addressing the "pull" factors that encourage people from these countries to enter the United States illegally. While the opportunity to improve their lives is certainly a draw, legal loopholes like those found in the *Flores Settlement Agreement* also encourage individuals to make the dangerous trek from Central America and Mexico into the United States. As such, CBP welcomes the opportunity to work with Congressional leadership to develop legislative fixes to enable the modernization of the Nation's immigration system.

Operational Control

On January 25, 2017, the President issued Executive Order 13767, *Border Security and Immigration Enforcement Improvements*, directing DHS to take steps to achieve complete operational control (OPCON) of the Southern Border. It requires CBP to have effective capabilities to predict, detect, identify, classify, track, respond, and resolve illegal border crossings. To meet these requirements, CBP deploys air, land, and marine assets to patrol and secure U.S. border areas. Executive Order 13767 also set as policy that a physical barrier shall be constructed on the Southern Border, infrastructure that has proven to have a profound positive impact on operational control of the border. Therefore, CBP is pursuing investments in border walls, barriers, and sophisticated detection and intervention systems that enable CBP to reduce the use of terrain for illegal cross-border activity. These assets and systems also allow CBP to develop and sustain situational awareness of threats and associated risks, which is enhanced further by information and intelligence-sharing partnerships. CBP's approach is designed to be nimble, threat-based, and intelligence-driven, allowing threats to be identified as early as possible, responses to be targeted, and resources to be deployed optimally in response to those threats and to counter illegal actions in the border environment.

DHS is developing an OPCON strategy, which will describe CBP's current OPCON of the border and how CBP will achieve full OPCON in support of Executive Order 13767.

Impact of Impedance and Denial

CBP explains some of these historical examples in Section IV: Evolving and Maturing Border Investment Strategy and Appendix B: Impedance & Denial Report in the 2017 Border Security Improvement Plan (BSIP). Section IV notes that “from about 2002 to 2008, the USBP doubled in size and investments were made in more than 600 miles of new physical barriers ... as a result of investment in physical barriers, the highest risk areas were covered with barriers tailored to meet the needs of those areas as understood at the time.”¹ This section notes that this initial investment in barriers and infrastructure was predominantly from El Paso to the West, which was the highest risk region at the time. It also notes that there was (b) (7)(E) (b) (7)(E) which is now “CBP’s area of highest activity, and is therefore a priority focus area for current investment strategies.”² Appendix B from the 2017 BSIP confirms that the deployment of Impedance & Denial capabilities along the Southern Border forced some threats to “shift from areas where border walls are deployed to target areas with limited or no border walls.”³



Figure 1: Border barrier deployment 2002-2008

Although CBP’s investment strategies are tailored to the current understanding of the threat, they “also recognize that our adversaries will seek to find ways to breach the border over, under, through, or around a wall.”⁴ Thus, CBP takes a proactive posture in its planning and future-year

¹ 2017 BSIP, Section IV, p. 21

² BSIP, Section IV, p. 22

³ BSIP, Appendix B: Impedance & Denial Report, p. 119

⁴ BSIP, Section IV, p. 23

resource decisions to anticipate changes in border threats based on any actions that CBP currently is taking along the border. For example, the type of barriers depicted in Figure 1 includes “legacy” fencing (shown as purple, light blue, or pink) or vehicle barrier (shown as orange). These types of barriers are not as capable or effective as modern pedestrian walls. Therefore, CBP’s investment strategy contemplates replacements or upgrades in these areas, as dictated by the evolving threat.

CBP investments in technology, border wall, and law enforcement personnel have been successful in increasing border security and contributing to OPGON of the border. Arizona serves as a good example. Prior to the investments of the past decade, the USBP (b) (7)(E)

(b) (7)(E)

CBP’s investment strategy anticipates that while a border wall impedes the progress of illegal entries, it also recognizes that our adversaries will try to find alternative, more challenging and less advantageous methods to breach the border, despite the increased presence of walls and other barriers. CBP will (b) (7)(E)

(b) (7)(E) (b) (7)(E) Consistent, informed situational awareness coupled with appropriate addition or enhancement of border roads for access and mobility enable USBP to respond appropriately to any breach or other illegal cross-border activity, including (b) (7)(E) As CBP tightens the security posture between the POEs, it anticipates (b) (7)(E)

(b) (7)(E)

Opioids, Narcotics, and Illegal Drugs

The growing epidemic of opioid misuse and abuse, combined with the prevalence of illicit opioids in the United States, is wreaking havoc in communities across the country. Drug overdoses are now the leading cause of accidental death in America. Almost one-third of these overdose deaths involved a synthetic opioid other than methadone, such as fentanyl and its analogues.⁵

Most of the illicit opioids in the United States are smuggled across the SWB or through international mail and express consignment hubs. Mexico has become the primary source of

⁵ Provisional Counts of Drug Overdose Deaths, The Centers for Disease Control and Prevention’s National Center for Health Statistics, as of 8/6/2017. *Note: Provisional overdose death counts for 2016-2017 are based on data available for analysis as of the date specified. Provisional counts may be incomplete, and causes of death may be pending investigation.*

heroin in the United States because of the increasing cultivation of poppies, as well as geographic proximity. Meanwhile, most of the illicit fentanyl, which is a very dangerous synthetic opioid, is coming into the United States after production in clandestine labs in China.

As noted in Figure 2 below, the CBP Office of Field Operations (OFO) fentanyl seizures increased 159 percent from FYs 2016 to 2017. (b) (7)(E)

(b) (7)(E)

OFO Fentanyl Seizures (Kgs) by Mode					
Mode of Transport	FY 2016		FY 2017		%Change (Kgs)
	Weight (Kgs)	Total Incidents	Weight (Kgs)	Total Incidents	
POV - Land	145.92	14	323.69	52	122%
Other - Land	25.42	6	63.49	13	150%
Express Consignment	21.42	40	108.88	118	408%
Mail	15.33	51	42.93	227	180%
Air (Other)	0.15	5	0.38	2	153%
TOTAL	208.25	116	539.38	412	159%

Figure 2: CBP Fentanyl Seizures⁶

CBP's efforts to combat this epidemic follow a multi-tiered approach that leverages partnerships, shared information, and resources to disrupt the supply chain and reduce the proliferation of these dangerous drugs.

Northern Border

In 2017, DHS conducted an assessment of Northern Border security and concluded that, although the Northern Border remains an area of limited threat in comparison to the Southern Border, safeguarding and securing the Northern Border presents unique challenges.⁷ The movement of illicit drugs as well as TCO activity are the two most common threats along the U.S.-Canadian border. (b) (7)(E)

(b) (7)(E)

⁶ Note: USBP did not track fentanyl seizures until July 2016. From July 7, 2016 – September 30, 2016, USBP seized 104.54 pounds of fentanyl. From October 1, 2016 – June 30, 2017, USBP seized 76.05 pounds of fentanyl.

⁷ DHS Northern Border Threat Analysis Report

https://www.dhs.gov/sites/default/files/publications/17_0731_Public_Summary_NBSRA_0.pdf

(b) (7)(E)

The United States and Canada have a shared history of economic and security interests that require DHS to collaborate with the Canadian government, as well as with other federal, state, local, and tribal (FSLT) partners, in addressing these threats. Given the strong ties between the United States and Canada, facilitating lawful trade and travel is also of utmost importance to this relationship.

The DHS Northern Border Strategy was issued on June 12, 2018. The Strategy outlines three goals for DHS's mission along the U.S.-Canadian border:

- Goal 1: Enhance Border Security Operations
- Goal 2: Facilitate and Safeguard Lawful Trade and Travel
- Goal 3: Promote Cross-border Resilience

The border security elements of the Northern Border Strategy are built on the three foundations of border security described earlier in this report: knowledge of the border environment, the ability to respond to that knowledge, and partnerships that expand knowledge or enhance response capabilities. The Northern Border Strategy is focused heavily on increasing DHS's access to timely and actionable information and intelligence. This involves significant partnerships with FSLT, and international partners ultimately to develop a common understanding of the threat environment.

DHS also is seeking to

(b) (7)(E)

(b) (7)(E)

(b) (7)(E) Finally, there are numerous law enforcement agencies with the ability to conduct security operations along the Northern Border. Integrating these capabilities through joint operations and task forces will strengthen DHS's ability to identify, interdict, investigate, and disrupt illicit cross-border activities.

The intent of the DHS Northern Border Strategy is to provide guidance and to direct actions that will improve DHS's ability to safeguard the Northern Border against terrorist and criminal threats, facilitate the flow of lawful cross-border trade and travel, and strengthen cross-border community resilience. The Strategy and its corresponding Implementation Plan will be used to identify gaps in DHS's Northern Border capabilities that can be addressed in order to achieve the Strategy's specified outcomes over 5 years, beginning in FY 2020.

⁸ DHS Northern Border Strategy, June 12, 2018, p. 11

Trade and Travel

CBP and ICE are unique federal law enforcement agencies because of their dual roles of securing U.S. borders while also facilitating international trade and travel. CBP seeks to intercept risks and potential threats at the earliest possible moment in the trade and travel process, beginning with a review of advance information. Prior to departure or entry, CBP uses a wide array of data sources, including advance information submitted by travelers and traders, to build risk assessments for travelers, cargo shipments, and supply chains. When advance targeting indicates that a person or shipment potentially may be high-risk, CBP can employ enforcement actions either prior to departure from the foreign port of origin or upon arrival at a particular POE. Enforcement actions by CBP then are coordinated with ICE for further investigation.

In addition, CBP partners with the business community to develop innovative approaches to cargo supply chain security. One approach that resulted from this collaboration is the Customs-Trade Partnership Against Terrorism (CTPAT). CTPAT is a voluntary, government-business initiative that protects the United States against acts of terrorism. This is achieved by improving the security of cargo entering and exiting the United States through rigorous security reviews of international supply chains and onsite visits of foreign suppliers that load and transport U.S. cargo. It began with seven importer companies, and since has expanded to include more than 11,000 companies from nearly every entity type to transport cargo in and out of the United States.

CBP must balance its security mission with its mission to facilitate lawful trade and travel. Facilitating trade protects the Nation's economy, promotes job growth, and helps the U.S. private sector to remain competitive. Facilitating trade and travel uses many of the same tools and techniques as securing trade and travel, both of which rely heavily upon getting information as early as possible. Cultivating relationships with the private sector and collaborating with other DHS components, and federal agencies and departments—such as the U.S. Coast Guard, ICE, U.S. Department of Health and Human Services (HHS), Consumer Product Safety Commission, and U.S. Department of Agriculture—and with foreign governments, increases the information available to CBP for making intelligence-driven, risk-based decisions. Increased and improved information allows CBP to identify low-risk passengers better and shipments faster and more accurately, expanding their efficient movement better through the import or travel process. Meanwhile, it also identifies the portion of the travelling public and American supply chain that genuinely poses a threat to U.S. national and economic security.

4. Border Security Improvement Plan

This document has been prepared to respond to the requirements specified in legislative language, as follows:

- Section III provides the goals, objectives, and activities as required by subparagraph (1) of the legislative language.
- Read in concert with the 2017 BSIP, Section IV identifies specific border security initiatives and investments in response to subparagraphs (2) through (4) and subparagraph (6) of the legislative language.
- Section V describes the performance metrics used to assess and report on the contributions of border security capabilities realized from current and future investments, as required by subparagraph (7) of the legislative language.
- Section VI addresses consultation requirements and environmental impacts of planned physical barriers along the southwest border, as required by subparagraphs (9) and (10) of the legislative language.
- Section VII includes appendices, including a description of the status of open U.S. Government Accountability Office and Office of the Inspector General recommendations, as required by subparagraph (8) of the legislative language.

III. Border Security Improvement Goals and Objectives

The goals and objectives that follow were articulated originally in the 2017 BSIP. They build on CBP's Vision & Strategy 2020 and are consistent with strategic guidance from the White House and DHS. These goals and objectives create a framework for CBP to analyze and prioritize strategies and investments that will strengthen CBP's ability to achieve high levels of borders security.

A. Goal 1: Enhance understanding of border threats and risks

Objective 1: Increase situational awareness

Intended Outcome: Increase CBP's ability to *see* what is happening in the border environment, to *understand* what is seen, and to *predict* what is going to happen in the near future and to better prepare CBP for an appropriate law enforcement response.

Key Capabilities:

- Domain awareness
- Analysis
- Risk assessment
- Screening and scanning
- Vetting
- Information sharing and dissemination
- Command, control, & communications

Associated Activities, Technology, and Resources:

- Intelligence collection
- Intelligence analysis
- National Targeting Center (NTC)
- Air and Marine Operations Center
- Northern Border Coordination Center
- Threat prediction and classification
- Passenger and cargo targeting
- Supply chain security
- International engagement
- Ground sensors
- Imaging systems
- Biometrics
- Mobile surveillance

FY 2018 – 2020 Milestones:

- Establish a cohesive CBP Intelligence Enterprise to foster and maintain a cohesive understanding of the dynamic threat environment.
- Develop a CBP Intelligence Enterprise Doctrine to govern and outline how CBP collects, analyzes, and disseminates intelligence.
- Establish a repeatable and standardized process for developing CBP's Priority Intelligence Requirements.
- Improve capabilities to maintain and improve situational awareness that better enable CBP to gain and maintain OPCON.

- Identify and implement solutions to advance trade, analytical and system capabilities to enable intelligent and secure trade enforcement.

Objective 2: Advance risk management in decision-making

Intended Outcome: Promote CBP's risk-based approach that identifies and evaluates threats, enabling CBP to identify the appropriate mix of capabilities and resources to achieve the highest possible levels of border security in all border environments.

Key Capabilities:

- Domain awareness
- Analysis
- Planning
- Information sharing and dissemination

Associated Activities, Technology, and Resources:

- Enterprise risk management
- Data Analysis
- Intelligence collection and analysis
- Collaboration with partners
- Performance management
- Acquisition management
- Planning, programming, budget, and accountability business process
- Investment analysis and portfolio management

FY 2018 – 2020 Milestones:

- Maximize the use of information and intelligence to analyze risk, prioritize threats, and anticipate emerging trends.
- Enhance law enforcement operations that are risk-informed, intelligence-driven, and integrated with domestic and international partners.
- Advance the National Vetting Center (NVC) to support intelligence-driven decision making.
- Develop risk assessment tools to expand identification of individuals and entities that have a nexus to illicit financing and terrorism-related activities.

Objective 3: Identify and counter criminal and terrorist organizations and networks

Intended Outcome: Strengthen CBP's counter-network approach across all aspects of CBP's mission set to attack and disrupt criminal and terrorist networks

Key Capabilities:

- Domain awareness
- Analysis
- Risk assessment
- Vetting
- Screening and scanning
- Information sharing and dissemination

Associated Activities, Technology, and Resources:

- NVC
- Targeting
- Counter-network operations
- NTC
- Operational and tactical risk management
- Network and data analysis
- Intelligence collection and analysis
- Collaboration with federal, state, local, international, and private-sector partners
- Trade and travel intelligence
- Information sharing
- Joint operations
- Capacity building

FY 2018 – 2020 Milestones:

- Advance initiatives, programs, and systems to protect the Homeland from terrorists and their weapons.
- Engage partners to enhance vetting, address migration flows in the Western Hemisphere, and lead efforts to enhance screening and vetting capabilities that can serve the entire U.S. Government, including the development of a National Vetting Center.
- Emphasize collaborative counter network operations at the national, Joint Task Force-Investigations, and corridor level.
- Protect our Nation's economy by targeting evasive trade practices, intellectual property rights violators, and the use of forced labor in supply chains.
- Advance CBP's ability to identify travelers positively and efficiently through the use of biometric entry/exit solutions that simplify entry and enhance security.
- Advance the NVC to provide scalable, consistent, targeted, and person-centric vetting across international traveler and immigration populations.

B. Goal 2: Strengthen enforcement operations at the border

Objective 1: Expand operational readiness

Intended Outcome: Strengthen CBP's ability to apply trained personnel and required equipment at the right time to the entire range of the CBP mission.

Key Capabilities:

- Planning
- Mission support
- Domain awareness
- Resource management

Associated Activities, Technology, and Resources:

- Workforce and mission support modelling
- Capability gap analysis
- Operational and tactical risk management
- Requirement development
- Resource management, modeling, and optimization
- Performance management
- Business process optimization
- Automation

FY 2018 – 2020 Milestones:

- Deploy proven surveillance technologies while pursuing innovative enablers such as small unmanned aerial systems (UAS) to support operators in the field.
- Develop Hiring & Recruiting Strategies for frontline and non-frontline personnel.
- Hire law enforcement and mission support personnel to meet mission requirements and requirements of Executive Order 13767.
- Conduct threat assessments and prioritize operations to achieve OPCON in high-risk areas.
- Ensure appropriate number of auditors and other trade enforcement personnel to enable intelligent trade enforcement.
- Conduct risk-informed, intelligence-driven operational planning to inform border security strategy and maximize resources for detection, interdiction and investigation.

Objective 2: Enhance impedance and denial of illegal border crossings

Intended Outcome: Delay and prevent illegal border crossings through achieving high levels of OPCON in the land border environment between the ports and high levels of enforcement at the POEs.

Key Capabilities:

- Impedance
- Denial
- Consequence delivery
- Risk assessment
- Screening
- Scanning
- Adjudication

Associated activities, Technology, and Resources:

- Ongoing requirements development and refinement for border barrier and associated technology
- Construction of border barrier and deployment of border security technology
- Hire agents and officers
- Modernize systems and technology at and between POEs
- Trade enforcement
- Travel enforcement

FY 2018 – 2020 Milestones:

- Implement and baseline OPCON across all USBP Sectors through informed application of agility and enhanced capabilities to impede or deny illegal border crossings and apply appropriate law enforcement responses.
- Develop improved processes to detect and interdict illicit opioids and other narcotics entering the country through International Mail Branches and Express Consignment Operations.
- Construct border wall and additional barriers as appropriate that are supported by technology and access roads in high-priority and high-threat locations.

• (b) (7) (E)

Objective 3: Ensure agility for appropriate and timely law enforcement responses

Intended Outcome: Strengthen mobile and rapid interdiction capabilities along with effective, modern tactical communications infrastructure to enable an appropriate and timely law enforcement response.

Key Capabilities:

- Command, control, & communications
- Interdiction
- Holding and processing
- Adjudication
- Surveillance

Associated Activities, Technology, and Resources:

- Land access
- Officer and agent safety
- Stage equipment and resources
- Hire law enforcement personnel
- Workforce modeling
- Modernize facilities, systems, and assets

FY 2018 – 2020 Milestones:

- Modernize aircraft, vessels, and domain awareness capabilities.
- Upgrade field technology assets, including mobile video surveillance systems, imaging equipment, and basic agent equipment, to support improved situational awareness, rapid response, and agent safety.
- Integrate outbound enforcement capabilities that coordinate verification of outbound travelers with U.S. law enforcement and intelligence communities for violations and support strengthened outbound enforcement.

C. Goal 3: Lead a resilient network of border enforcement capabilities

Objective 1: Expand information- and intelligence-sharing partnerships

Intended Outcome: Enable CBP to take a proactive enforcement posture and support effective border management.

Key Capabilities:

- Information sharing
- Intelligence
- International engagement
- Risk assessments

Associated Activities, Technology, and Resources:

- Joint Security Program
- Automated Targeting System-Global
- Risk management
- Intelligence and information sharing
- Intelligence and data analysis
- Integrated intelligence enterprise
- Collaboration and coordination with partners
- Develop a common platform to ensure timely access to intelligence information in a centralized repository
- Intelligence training

FY 2018 – 2020 Milestones:

- Advance CBP relationships with key partners to strengthen data-exchange efforts such as the Joint Security Program and Automated Targeting System-Global.
- Deploy short-term initiatives and develop capabilities for data sharing with domestic and foreign partners to improve vetting quality and address current information gaps.

Objective 2: Increase ability to address border security risks as early as possible

Intended Outcome: Stop threats effectively before they reach U.S. borders.

Key Capabilities:

- Information sharing
- Risk assessments
- Analysis
- International engagement

Associated Activities, Technology, and Resources:

- Coordinate internationally
- Joint operations
- Deploy CBP staff and assets overseas
- Intercept and deters illicit activity
- Coordinate resources with partners
- Coordinate with Canada and Mexico

FY 2018 – 2020 Milestones:

- Develop integrated approaches to current and evolving threats via collaboration with partners to develop a comprehensive understanding of the threat environment.
- Coordinate between the United States and Mexico and Central American partners to support strengthened border security and continued expansion of travel enforcement through preclearance operations.

Objective 3: Strengthen coordinated border enforcement globally

Intended Outcome: Lead a more resilient global network of border security capabilities

Key Capabilities:

- International engagement
- Joint operational planning

Associated Activities, Technology, and Resources:

- Technical assistance
- Training
- Capacity building

FY 2018 – 2020 Milestones:

- Strengthen interagency and international partnership to support joint operations across regions of the Western Hemisphere to interdict the trafficking of narcotics and illicit goods.

IV. Border Security Initiatives and Implementation Plans

Pursuant to the legislative language directing submission of this document, the following section identifies planned initiatives and projects “for improving security along the borders of the United States, including the use of personnel, fencing, other forms of tactical infrastructure, and technology.” These initiatives and projects are based on the initiatives identified in the 2017 BSIP, and are updated on the basis of changes in the threat environment and an assessment of CBP’s ability to achieve the goals and objectives described in Section III.

The following investment initiatives represent the current requirements that CBP has identified and is working to implement within current funding. Ongoing evaluation of these and future investment opportunities is a necessary element in the process of continuously improving border security. CBP is executing deliberative acquisition programs in accordance with DHS Management Directive 102-01. The acquisition process includes a disciplined approach that ensures the clear definition of requirements and a rigorous assessment of options and means to meet those requirements. The process also breaks down the acquisition progress into stages allowing for approval (or disapproval, as appropriate) of procurement recommendations and close oversight of the execution of contracts and the deployment of infrastructure and technology. CBP also conducts its operational requirements work in accordance with DHS “Joint Requirements Integration Management System,” policy D107-01.

Most of the identified initiatives are being implemented concurrently with enacted FY 2018 appropriations, with others to be funded potentially in FY 2019 or in future years. Taken together, these projects represent CBP’s current program for ensuring comprehensive border security. Actual funding amounts for FYs 2019-2027 are yet to be determined and will be addressed in future budget cycles.

Consistent with CBP’s multipronged approach, the projects are presented using the following categories: Between the POEs, At the POEs, and Beyond the Borders. An additional initiative is listed in an enterprise-wide category because it would benefit all areas of border security. A summary listing of proposed or in-process investment initiatives follows.

FY 2018 BSIP Initiatives			
	FY 2018 Request	FY 2018 Enacted	FY 2019 Request
Between the POEs			
Personnel			
1. USBP Agents and Related Mission Support Personnel	\$164.6M	\$24.6M	\$164.3M
2. USBP Agent Relocations	\$11.0M	\$21.0M	\$45.1M
3. Air and Marine Operations (AMO)	\$23.2M	\$0	\$0

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FY 2018 BSIP Initiatives			
	FY 2018 Request	FY 2018 Enacted	FY 2019 Request
Enforcement and Related Support Personnel			
Facilities, Equipment, and Technology			
4. USBP Facilities Modernization and Expansion	\$45.0M (Brown Field Border Patrol Station (BPS))	\$45.0M (Brown Field Border Patrol Station (BPS))	\$33.4M (Freer BPS)
5. USBP Facilities Maintenance and Construction (IT Management)	\$7.6M	\$4.5M	\$4.5M
6. AMO Facilities Maintenance & Repairs	\$28.7M	\$27.8M	\$27.9M
7. USBP Field Mobility: Vehicles, Boats, and Transportation	Vehicles: \$73.2M	Vehicles: \$93.2M	Vehicles: \$81.9M
	Airboats \$0.9M	Airboats \$0.9M	
	Transportation \$45.2M	Transportation \$45.2M	Transportation \$45.2M
8. Tactical Air, Land, & Marine Enterprise Communications	\$54.1M	\$54.1M	\$48.9M
9. Border Patrol Enforcement System (BPES)	BPES: \$34.9M	BPES: \$37.9M	BPES: \$44.9M
	Unattended Ground Sensors (UGS) O&S: \$3.2M UGS PC&I: \$20.0M	UGS O&S: \$3.2M UGS PC&I: \$20M	UGS O&S: \$6.8M UGS PC&I: \$0
10. Integrated Fixed Towers (IFT) and Block 1	IFT O&S: \$22.4M IFT PC&I: \$17.4M	IFT O&S: \$12.6M IFT PC&I: \$39.2M	IFT O&S: \$22.0M IFT PC&I: \$2.0M
	Block 1 O&S: \$13.3M	Block 1 O&S: \$13.3M	Block 1 O&S: \$12.8M
11. Mobile Video Surveillance Systems (MVSS)	O&S: \$3.2M PC&I: \$1.6M	PC&I: \$46.8M	O&S: \$13.4M PC&I: \$1.6M
12. Remote Video Surveillance Systems (RVSS)	SWB RVSS O&S: \$20.0M PC&I: \$46.2M	SWB RVSS O&S: \$20.0M PC&I: \$87.2M	SWB RVSS O&S: \$27.4M PC&I: \$43.7M
	Northern Border RVSS: O&S: \$8.0M	Northern Border RVSS: O&S: \$8.0M	Northern Border RVSS: O&S: \$8.1M
		PC&I: \$7.0M	

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FY 2018 BSIP Initiatives			
	FY 2018 Request	FY 2018 Enacted	FY 2019 Request
13. Linear Ground Detection System (LGDS)	O&S: \$0.5M	O&S: \$0.5M PC&I: \$16.0M	O&S: \$1.0M
14. Maritime Detection Project (MDP)	PC&I: \$0.0M	O&S: \$2.4M PC&I: \$9.0M	O&S: \$2.9M
15. California Coastal Surveillance (CCS)	O&S: \$1.0M	O&S: \$1.9M	O&S: \$1.4M
16. USBP Mobile Surveillance Capability	O&S: \$16.2M	O&S: 16.2M PC&I: \$8.0M	O&S: \$17.4M PC&I: \$0.0M
17. USBP Tactical Aerostats	\$34.6M	O&S: \$32.1M PC&I: \$2.7M	O&S: \$44.0M PC&I: \$0
18. USBP Handheld Surveillance Equipment	\$0	PC&I: \$3.0M	\$0
19. Cross Border Tunnel Threat (CBTT) Program	PC&I: \$9M	PC&I: \$42.0M	\$0
20. AMO Fortify DHC-8 Fleet	PC&I: \$13.3M	PC&I: \$13.3M	\$0
21. AMO Fortify Multi-Role Enforcement Aircraft (MEA) Fleet	PC&I: \$55.5M	PC&I: \$77.5M	PC&I: \$56.7M
22. AMO Fortify Air and Marine Fleet	O&S: \$18.1M PC&I: \$93.1M	O&S: \$18.1M PC&I: \$117.8M	O&S: \$7.9M PC&I: \$22.8M
23. AMO Unmanned Aircraft System (UAS) Acquisition & Expansion	\$0	O&S: \$15.0M	\$0
24. AMO Fortify P-3 Aircraft Fleet	\$0	\$0	\$13.6M
25. AMO Minotaur Implementation	\$0	\$0	\$0
26. AMOC System Upgrades	\$0.9M	\$0.9M	\$0
27. AMO Federal Aviation Administration Next Generation	PC&I: \$3.3M	PC&I: \$3.3M	PC&I: \$3.7M
28. AMO Tasking, Operations, & Management Information System (TOMIS)	\$3.8M	\$3.8M	\$3.8M
29. USBP Small UAS	\$2.5M	O&S: \$12.5M PC&I: \$10M	\$0

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FY 2018 BSIP Initiatives			
	FY 2018 Request	FY 2018 Enacted	FY 2019 Request
Tactical Infrastructure			
30. Border Wall and Fencing			
a. New Wall System	\$1,282.2M	\$641.0M	\$1,600.0M
b. Replacement Primary Wall	\$0	\$445.0M	
c. Replace Secondary Wall	\$251.0M	\$251.0M	
d. Wall Planning	\$38.0M	\$38.0M	
31. AMO Tethered Aerostat Radar System Enhancements	\$0	\$3.2M	\$0.0M
At the POEs			
Personnel			
32. NTC Staff Expansion	\$10.0M	\$10.0M	\$16.7M
Facilities, Equipment and Technology			
33. NTC Intelligence and Targeting System Upgrades	\$54.9M	\$52.4M	\$65.1M
34. Land POE Projects			
a. CBP PC&I Budget	PC&I: \$14.8M	PC&I: \$14.8M	PC&I: \$14.8M
b. U.S. General Services Administration Federal Buildings Fund	\$507.0M	\$254.8M	\$275.9M
35. Biometric Entry-Exit	\$71.0M	Fee Funded	Fee Funded
36. Arrival and Departure Information System (ADIS)	\$27.0M	\$27.0M	\$27.0M
37. Electronic Visa Update System (EVUS)	\$27.7M	\$27.7M	\$27.7M
38. Immigration Advisory Program (IAP)	\$9.2M	\$9.2M	\$14.2M
39. Preclearance	\$70.3M	\$70.3M	\$70.8M
40. CBP Mobile Technology	\$12.0M	\$12.0M	\$12.0M
41. OFO Non-Intrusive Inspection Acquisitions	\$109.2M	\$224.6M	\$44.2M
42. Border Security Deployment Program (BSDP)	\$11.1M	\$11.1M	\$11.1M
43. Opioid Testing and Safety Expansion	\$0	\$30.5M	\$0
44. Customs-Trade Partnership Against Terrorism (C-TPAT)	\$40.0M	\$40.0M	\$40.5M

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FY 2018 BSIP Initiatives			
	FY 2018 Request	FY 2018 Enacted	FY 2019 Request
45. Container Security Initiative	\$62.8M	\$50.8M	\$71.6M
46. OFO Agricultural Risk Detection	\$0	\$0	\$0
47. OFO Primary/Secondary IT Refresh	\$0	\$0	\$0
Enterprise-wide			
48. Office of International Affairs – International Diplomacy Mission	\$39.7M	\$35.1M	\$44.2M
49. Enhance Law Enforcement Safety & Compliance (LESC) Staffing & Procurement	\$45.5M	\$0	\$40.5M
50. Office of Intelligence Staffing Increases	\$34.0M	\$37.3M	\$47.8M
51. Intelligence Capability Increases	\$16.9M	\$16.5M	\$16.8M
52. Laboratory and Forensic Support Expansion	\$0	\$0	\$0

Detailed descriptions of newly developed investment initiatives are provided below and on the following pages. These descriptions are not provided in a priority order. The numbering associated with each priority initiative is intended only for ease of reference. Each initiative is accompanied by a brief description, an explanation of the outcomes that it is intended to influence, an overview of the costs, milestones for implementation, a description of any methods used to identify the solution, and any methods used to evaluate effectiveness.

2018 BSIP Initiative # 1: National Vetting Center

OVERVIEW: National Security Presidential Memorandum 9, *Optimizing the Use of Federal Government Information in Support of the National Vetting Enterprise*, signed on February 6, 2018, established the NVC to be led by DHS. The Secretary subsequently delegated this authority to CBP. National Security Presidential Memorandum 9 requires a 180-day implementation plan, which was completed and submitted to the Administration on August 15, 2018 and subsequently approved by the President. NVC resourcing requirements constituted a significant portion of the FYs 2020-2024 Winter Study, titled “Enhancing Screening & Vetting through Information Sharing.”

AFFECTED CAPABILITIES:

- Screening
- Scanning

- Targeting and vetting
- Intelligence
- Analysis

RELATED OUTCOMES:

BSIP Goal 1, Objective 3: Strengthen CBP's counter-network approach across all aspects of CBP's mission set to attack and disrupt criminal and terrorist networks

IMPLEMENTATION PLAN

- (b) (7)(E)
- DHS will need to support the continuing development of the Joint Worldwide Intelligence Communication System-based results hub and case management viewer.
- NVC will require oversight and other support personnel.
- (b) (7)(E)
- DHS components such as CBP, USCIS, and ICE may need to support (b) (7)(E)
- (b) (7)(E)

2018 BSIP Initiative # 2: Intelligent Trade Enforcement, Analytics, and Systems

OVERVIEW: Intelligent Trade Enforcement is a key part of *Trade Strategy 2020*, which is a comprehensive approach to addressing several mandates and capability gaps for CBP trade operations identified by the Department and the Administration as detailed in Executive Order 13785: *Establishing Enhanced Collection and Enforcement of Antidumping and Countervailing Duties and Violations of Trade and Customs Laws*.

Intelligent Trade Enforcement aims to protect U.S. economic viability by subverting trade networks that finance illicit activity. This approach will enhance targeting (b) (7)(E)

(b) (7)(E)

(b) (7)(E) Intelligent enforcement also will enable CBP to:

- Increase controls over revenue in critical areas and reduced revenue loss, and improve analytics for comprehensive risk management;
- Expand CBP's common intelligence picture focused on illicit trade threats and supply chain dynamics via information and intelligence product development by the Trade Intelligence Division and CBP's Intelligence Enterprise partners;
- Develop new functions for financial, account, network, and pattern-based targeting;

- Integrate activities at tactical (port), operational (Centers of Excellence and Expertise, National Threat Analysis Centers), and strategic (Headquarter) levels through federated view;
- Develop more efficient regulations, policies, and systems to manage volumes and shifts in patterns, and to improve facilitation; and empower employees with skills, strategies, and the means to manage next-generation trade environment.

AFFECTED CAPABILITIES:

- Risk assessments
- Analysis
- Screening
- Scanning
- Information sharing and dissemination

RELATED OUTCOMES:

BSIP Goal 2, Objective 2: Enhance impedance and denial of illegal border crossings

BSIP Goal 3, Objective 2: Increase ability to address border security risks as early as possible

Intelligent enforcement will result in:

- Accomplishing the Executive Order 13785 on antidumping and countervailing duties, which would enhance bonding recommendations;
- Developing an analytics capability that complements Automated Commercial Environment (ACE) cargo processing and Automated Targeting System targeting;
- Building (b) (7)(E) targeting capability in the Automated Targeting System;
- Creating a federated view of importers;
- Developing simplified processes and deploying ACE enhancements; and
- Establishing a staff model for the modern trade environment.

IMPLEMENTATION PLAN: The Intelligent Trade Enforcement initiative has been prioritized by agency leadership and focuses on the central core of *Trade Strategy 2020*. This initiative puts advanced data analytics tools into the hands of users to provide them with new decision-making tools and information. CBP anticipates exploring the pursuit of a new “federated view” capability that consolidates importer data and enforcement workflows, to ensure that CBP operators and analysts have an integrated awareness of activities for an importer at all levels.

(b) (7)(E)

The initiative also will support additional ACE enhancements, including planned simplification of billing and statements, the creation of monthly import declarations and summaries, and consolidated liquidation processes in support of antidumping and countervailing duties administration. These will result in increased efficiencies for trade and CBP, better risk management, and the anticipated reduction of burdensome processing and storage requirements that support long-term liquidation and billing.

2018 BSIP Initiative #3: Personnel Recovery

OVERVIEW: Presidential Policy Directive-30 directs that “each agency with overseas responsibilities shall inform its employees of U.S. policy regarding hostage takings, and provide personnel recovery preparation, education, and training programs to help their employees understand the risk environment, evade capture, survive captivity, minimize their vulnerability to exploitation, and enable their recovery from a threat environment.” On October 4, 2016, the CBP Commissioner’s Priorities and Key Deliverables for FY 2017 memorandum included the following:

- CBP will develop a force protection pre-deployment training plan to prepare all deploying CBP employees for the risks of international travel and assignments.
- CBP will develop a Personnel Recovery Program that addresses policies, training, and infrastructure – consistent with Presidential Policy Directive-30, to prepare CBP employees for travel to high-threat countries and enable their recovery from a threat environment.

AFFECTED CAPABILITIES:

- International engagement
- Information sharing
- Joint operational planning with DOS and other federal partners
- Risk assessments
- Analysis

RELATED OUTCOMES:

BSIP Goal 3: Lead a resilient network of border enforcement capabilities

Objective 1: Expand information- and intelligence-sharing partnerships

Objective 2: Increase ability to address border security risks as early as possible

Objective 3: Strengthen coordinated border enforcement globally

IMPLEMENTATION PLAN:

- Establish CBP personnel recovery policy
- Finalize personnel recovery training requirements that also meet State Department Foreign Affairs Counter Threat and High Threat Security Overseas Seminar training requirements

2018 BSIP Initiative #4: Cloud Migration

OVERVIEW: The CBP Office of Information and Technology (OIT) actively is pursuing cloud migration to reduce technical debt and transform the way that the agency delivers IT solutions to its mission customers. Moving to the cloud is more than an opportunity to move the existing portfolio from an onsite data center to the cloud, it is a long-term effort to streamline, rationalize, and standardize our services. Thus far, the migration effort has taken time, effort, and energy, above and beyond OIT's day-to-day responsibilities. OIT has achieved important milestones in the Data Center Migration effort across several critical areas: security, applications, infrastructure & design standards, and network.

AFFECTED CAPABILITIES:

- Targeting: Targeting and Analysis Systems Program Directorate has supported CBP in expanding the Biometric Exit Program across additional airports both international and domestic, while also communicating with additional airlines for biometric screening adoption.
- Mobility: Enforcement applications will become available in the cloud to include:
(b) (7)(E)
(b) (7)(E) Furthermore, the Mobility Center of Excellence & Expertise has been working with customers across CBP to prototype and deploy cloud native mobile applications that address emerging needs. These applications are built using CBP's common application framework, with reusable architecture and consistent branding.
- Passenger Processing: Passenger Systems Program Directorate is expanding development work across a section of targeted applications within TECS and e-Business systems to support eventual migration to Cloud East.

RELATED OUTCOMES:

BSIP Goal 1, Objective 1: Increase situational awareness

BSIP Goal 2, Objective 1: Expand operational readiness

BSIP Goal 2, Objective 2: Enhance impedance and denial of illegal border crossings

BSIP Goal 2, Objective 3: Ensure agility for appropriate and timely law enforcement responses

IMPLEMENTATION PLAN: The OIT Migration Plan comprises four major phases that the IT Migration Project will execute in an iterative process to leverage new methods and technologies and incorporate lessons learned throughout the life of the engagement. CBP has developed a plan that will drive migration and optimization efforts, continue cloud-computing initiatives, and promote enterprise solutions to help OIT operate an efficient migration to the cloud. This approach will help OIT to understand their portfolio better and assess and prioritize migration efforts.

- Discovery Phase: Create an inventory of systems and applications, including current-state architecture, design goals, and future-state hosting requirements.
- Cloud Suitability Assessment & Rationalization: Perform disposition analyses to address business process alignment and high-level cloud suitability. Applications are analyzed and assigned a transformation readiness “score” as an output, and revisions occur in an iterative fashion to gain efficiencies.
- Migration Course of Action Decision: Select a subset of systems for further future-state detailed assessment. Conduct technical engineering assessments to explore further the future-state architecture, sizing requirements, and application linkages and dependencies.
- Project Implementation: Generate a final system prioritization list for a transformation roadmap. Target platforms and identify and prioritize adoption waves to allow CBP to test its cloud strategy. Incorporate lessons learned to improve future projects and yield more accurate costing evaluations.

V. Ensuring Accountability in Border Security

A. Measuring OPCON and Security at the Immediate Border

In compliance with Executive Order 13767, CBP is reinstituting achieving OPCON between the POEs across the entirety of the Southern Border as its overarching goal to ensure that:

- Illegal entries across the U.S. border with Mexico are impeded and denied by sufficient walls, fencing, and other physical and natural barriers;
- USBP agents have a high level of situational awareness that includes near-term predictions of potential illegal entry attempts, as well as an ever-increasing capability to detect illegal entries as they occur; and
- USBP agents can respond efficiently to and interdict illegal entries of people or contraband by training, equipping, and enhancing availability of all agents.

CBP will measure OPCON directly via three elements: impedance and denial (including wall and other barriers, as well as measures of recidivism); situational awareness (including technologies that allow USBP to detect, identify, and track illegal entries, and intelligence capabilities); and law enforcement resolution (including the ability to respond to detections and make a final apprehension). Each of these elements will be evaluated and calculated via a host of subordinate measures currently in development. To aid in the transition to OPCON, DHS recently endorsed an Agency Priority Goal that will begin in FY 2018 and end in FY 2020, to allow for the establishment of a border security end state between POEs along the Southern Border by implementing the OPCON framework to articulate success and direct resources.

Concurrently, technological advances at the border over the past several years have increased situational awareness significantly. Among the three elements of OPCON, situational awareness is a major cornerstone. It combines domain awareness with intelligence data and other information to give USBP the best possible knowledge of how much illicit activity is occurring at the border and what that activity is. In turn, increased situational awareness has allowed USBP to begin pursuing modeling efforts based on the Department's more complete information about illegal entry attempts. (b) (7)(E)

(b) (7)(E) Increasing situational awareness narrows the gap between the known and unknown flow, and puts DHS in a position to build ever better observational estimates of border security.

In the interim, USBP will continue to explain its performance using its risk methodology via State of the Border reporting, in addition to reporting numerous measure results under the structure set out in the Government Performance and Results Act Modernization Act (GPRAMA) structure. USBP's most notable GPRAMA measures are the interdiction

effectiveness rate and the percent of people apprehended multiple times along the Southern Border (recidivism rate). Both of these measures are reported publicly in addition to contributing to USBP “State of the Border Metrics.” In addition, in September 2017, DHS produced an estimate of border security between POEs report⁹ that provides details on an array of indicators that, when combined, provide insight into the state of border security between the POEs on the SWB. More specifically, this report provides indicators within two overarching categories: estimated enforcement outputs and estimated enforcement outcomes.

B. Border Security in the Air and Maritime Environment

CBP’s measures under the GPRAMA in the air and maritime environments complement those reported by USBP and OFO to provide a more complete picture of border security. The two primary measures described below parallel the concepts discussed above because they contribute to CBP’s awareness of activities in the border environment while also assessing the ability to act upon that knowledge. The two GPRAMA measures that CBP’s AMO uses include:

- *Percent of detected conventional aircraft incursions resolved along all borders of the United States:* This measure represents the percentage of conventional aircraft detected visually or by sensor technology, which is suspected of illegal cross-border activity and is brought to a successful law enforcement resolution.
- *Air Mission Launch Rate:* This represents AMO’s capability and/or capacity to launch an aircraft when a request is made for aerial response. This measure captures the percent of all requests made for aircraft to which AMO was able to respond.

C. Border Security Measures at the POEs

OFO manages the lawful access of people and goods to the United States by securing and expediting international trade and travel at the POEs. CBP enforces the customs, immigration, and agricultural laws of the United States, together with the laws and regulations of other government entities at the border, such as ICE, DOS, U.S. Department of the Treasury, the Food and Drug Administration, Consumer Product Safety Commission, U.S. Department of Agriculture, and HHS, among others.

Every traveler and cargo shipment seeking entry to the United States by air, land, or sea through one of the 328 POEs must present themselves to CBP Officers, who determine admissibility and identify violations of the law and potential threats to public safety. OFO works to identify risks and potential threats at the earliest possible moment in the trade and travel process by using the most current law enforcement and targeting information assembled by (b) (7)(E) to screen both individual travelers and cargo shipments. The (b) (7)(E)

⁹ https://www.dhs.gov/sites/default/files/publications/17_0914_estimates-of-border-security.pdf

(b) (7)(E)
(b) (7)(E) and to assess the potential security risks of cargo shipments. (b) (7)(E) uses a wide array of law enforcement data sources, as well as information that must be provided by shippers in advance of arrival at the POE, to assess the security risks of cargo shipments before they arrive. (b) (7)(E)

(b) (7)(E)
(b) (7)(E) In addition, DHS uses automated systems and enforcement operations to ensure that persons, shipments, and conveyances departing the United States are in compliance with U.S. laws and regulations. The goal of the outbound enforcement effort is to disrupt/dismantle criminal enterprises, terrorist organizations, and rogue nations by seizing illegal firearm shipments and smuggled currency, interdicting illegal exports of controlled/sensitive commodities, and arresting members or associates of these organizations.

Travel and trade continue to grow steadily, together with expanding mission requirements, challenging CBP efforts to secure the border at the POEs. During FY 2017, OFO inspected more than 397 million travelers, conducted more than 34.2 million traveler secondary exams, screened more than 104 million privately owned vehicles, conducted more than 4 million privately owned vehicle secondary exams, conducted more than 19.6 million passenger agricultural inspections, and prevented more than 216,000 inadmissible aliens from entering the United States illegally. On the cargo side, OFO inspected 11.8 million truck containers and conducted physical examinations on more than another 2.7 million, inspected more than 28 million sea containers and physically examined an additional 5.2 million, conducted nearly 1.8 million agricultural cargo and conveyance inspections, and made more than 128,000 pest interceptions. Overall, OFO made nearly 40,000 seizures of contraband, including narcotics, currency, and weapons, and more than 19,600 arrests.

In addition to tracking, monitoring, and reporting an extensive array of operational data on passenger and trade inspection and enforcement activity, OFO uses a number of high-level organizational measures to provide a broader assessment of border security at the POEs:

- *Percentage of inbound cargo identified by CBP as potentially high-risk that is assessed or scanned prior to departure or at arrival at a U.S. POE:* This is a comprehensive measure that covers the sea, air, and land modes for all cargo destined to arrive at the POEs. Screening and resolving potentially high-risk cargo prior to or at arrival at the POEs ensures the safety of the U.S. public and minimizes the impact to trade through the effective use of risk-focused targeting.
- *Amount of smuggled outbound currency seized at the POEs:* Covers outbound operations conducted across all POEs.
- *Number of smuggled outbound weapons seized at the POEs:* Covers outbound operations conducted across all POEs. Does not include administrative holds and seizures that were released later for shipment upon corrective action.

- *Compliance rate for CTPAT members with the established CTPAT security guidelines:* Compliance with the CTPAT security guidelines ensures that CTPAT trade partners are implementing the CBP-advised internal security practices and meeting industry-specific security standards.
- *Cost savings benefit for CTPAT members:* Represents the savings that a CTPAT partner achieves through membership in the program. Uses the number of examinations that the partner does not undergo because of membership and the nationally averaged dollar cost by transportation mode (air, rail, truck, and vessel) of an examination. New measure for FY 2018.
- *Percentage of Global Entry and other Trusted Traveler program members with no security-related revocations:* Trusted Traveler members are vetted recurrently against derogatory information to maintain eligibility for the program. New measure for FY 2017.
- *Percentage of air passengers compliant with laws, rules, and regulations:* Measures compliance with all the laws, rules, and regulations enforced at the international airports on behalf of CBP and all other agencies that CBP supports, as tasked by Congress, with the exception of agricultural laws and regulations.
- *Percentage of land border passengers compliant with laws, rules, and regulations:* Measures compliance with all the laws, rules, and regulations enforced at the land border POEs on behalf of CBP and all other agencies that CBP supports, as tasked by Congress, with the exception of agricultural laws and regulations.
- *Percentage of international air passengers compliant with Agricultural Quarantine Regulations:* Measures compliance with all the agricultural quarantine laws and regulations enforced at the international airports on behalf of CBP and U.S. Department of Agriculture, as tasked by Congress.
- *Percentage of border vehicle passengers compliant with Agricultural Quarantine Regulations:* Measures compliance with all the agricultural quarantine laws and regulations enforced at the land border POEs on behalf of CBP and the U.S. Department of Agriculture, as tasked by Congress.
- *Percentage of individuals screened against law enforcement databases for entry into United States:* Measures the success rate of electronically screening and vetting all travelers against the major law enforcement databases used by CBP to ensure that CBP has as much information as possible about every individual.

VI. Conclusion

A. Future Planning

The 2018 BSIP provides CBP with a framework to analyze and prioritize planning to improve border security. It begins by establishing a common understanding of the meaning of border security as a function of:

- Knowing what is happening in the border environment,
- Having the ability to act or respond to that knowledge, and
- Cultivating partnerships that enhance knowledge and ability to act.

Strengthening border security is an ongoing and iterative process. The initiatives detailed in this document provide actions and milestones supporting the goals and objectives in this plan, and they represent current known requirements. As CBP continuously strengthens border security, these initiatives will be evaluated for their ongoing contributions to improving border security.

1. Mitigating Outside Influences

A comprehensive approach to border security must recognize that there are many factors beyond DHS's control that affect border security. Those factors can increase or decrease the demands on DHS, which, in turn, may affect DHS's operational footprint and requirements.

For example, many sociological factors naturally affect border security. This includes factors that "pull" people to enter the United States and "push" them from their homelands. The state of the economy, political climate, corruption, crime rates, and disease outbreaks all can work as "push" factors to encourage people to leave their home country. Conversely, the state of the U.S. economy, the U.S. legal system, the effectiveness of internal enforcement, the availability of social services, and the U.S. political climate all can work as "pull" factors encouraging people to attempt to cross our borders illegally. The number of people influenced by these push and pull factors has an impact on DHS. More people seeking to enter the country (at or between the ports) requires an increase in CBP personnel and resources to achieve a constant level of border security. Thus, any assessment that CBP conducts of the resources that it needs to ensure border security will always depend on assumptions about these outside influences.

U.S. legal and governmental elements and considerations also will affect border security. For example, national policies on immigration affect border security. Similarly, a legal framework facilitates effective border security if it empowers law enforcement personnel with appropriate authority to detect, and apprehend those who attempt to enter the United States illegally. This legal framework also should support frontline law enforcement personnel by instituting efficient processes for removing individuals who enter the United States contrary to law. Conversely, a

legal system that does not meet these benchmarks, is an impediment to border security. The governmental considerations that affect border security are complicated further by the fact that there are many federal agencies that have a role in the flow of goods or people into and out of the United States. The efficiency with which these agencies work together and the effectiveness of interagency collaboration naturally will affect DHS's role in securing the border.

2. Immigration Reform

While a comprehensive approach to border security necessarily must include active support to all of DHS's layered enforcement efforts, it also must include many other elements. For example, an effective immigration system often begins with effective legal processes. If individuals do not face adequate consequences for illegally entering the United States, such as removal or prosecution, then those individuals and others are incentivized to try to cross the border illegally.

An effective system of immigration should include statutory provisions that enable DHS and its partner enforcement agencies to apprehend, process, review, and return quickly those individuals who attempt illicit crossings at our borders who are not otherwise eligible for an immigration benefit. Additionally, an effective system would enable those who are entitled to enter the United States legally with a safe, understandable, timely and efficient legal process.

The development of such a system requires the participation of Congress and the other federal agencies involved in immigration enforcement including, but not limited to, USCIS, ICE, the Department of Justice, and DOS. For example, Congress may develop a more effective immigration system through statutory changes. Although any legislative changes to immigration or other legal authorities may not always affect CBP directly, the development of a more efficient immigration system will enhance CBP's ability to perform its mission in securing the border and enforcing U.S. laws. CBP also is committed to working with Congress and law enforcement partners to share its institutional knowledge of the border to suggest opportunities to improve and enhance the effectiveness of the legal framework within which it operates.

3. Consultation

DHS recognizes the importance of consultation and frequently consults with federal stakeholders such as the Department of the Interior and the Environmental Protection Agency concerning environmental impacts related to the construction of border barriers, to include impacts to the Santa Ana National Wildlife Refuge. In the spring of 2017, CBP initiated coordination with the U.S. Department of Interior, U.S. Fish & Wildlife Service, and U.S. Environmental Protection Agency to inform them of the planning, design, and construction phases of the border wall system, and to consult U.S. Fish & Wildlife Service on resources that may be present in project areas, as well as potential impacts and mitigation measures in order to minimize or eliminate impacts to the environment.

Since these initial discussions, CBP has conducted additional meetings with the U.S. Environmental Protection Agency, U.S. Department of Interior, and other federal and state agencies on CBP's FY 2018 wall projects to incorporate their concerns and considerations. CBP also soon will be conducting biological and cultural surveys in the project area within the Rio Grande Valley Sector for its FY 2018 projects. An analysis of the potential impacts from these projects will be prepared once all of the data are collected and further consultation with resource agencies is completed.

CBP's ongoing consultation includes but is not limited to federal land managers, the U.S. Fish and Wildlife Service, Native American tribes, and State Historic Preservation Officers to obtain information related to the presence of natural and cultural resources within the project area, as well as to identify construction best management practices and any appropriate mitigation measures.

VII. Appendices

Appendix A. List of Acronyms

Acronym	Definition
ACE	Automated Commercial Environment
ADE	Acquisition Decision Event
AMO	Air and Marine Operations
ASO	Alien Smuggling Organization
BIEC	Border Interagency Executive Council
BPRT	Border Patrol Enterprise Reporting Tool
BPES	Border Patrol Enforcement System
BSIP	Border Security Improvement Plan
CAVSS	Centralized Area Video Surveillance System
CBP	U.S. Customs and Border Protection
CBTT	Cross-Border Tunnel Threat
CCS	Cargo Conveyance and Security
CCTV	Closed Circuit Television
CDS	Consequence Delivery System
CDS-PMO	CDS Project Management Office
CERTS	Cargo Enforcement Reporting and Tracking System
CM	Configuration Management
CRD	Capabilities and Requirements Division
CSM	Container Status Message
CTPAT	Customs-Trade Partnership Against Terrorism
D/EAC	Deputy Executive Assistant Commissioner
DHS	U.S. Department of Homeland Security
DOS	U.S. Department of State
DTO	Drug Trafficking Organization
ECCF	Express Consignment Carrier Facility
EIAB	Economic Analysis Branch, Regulations and Rulings
ES	Enterprise Services
ESD	Enforcement Systems Division
FISMA	Federal Information Security Management Act
FM&E	Facilities Management and Engineering Office
FROB	Foreign Cargo Remaining On Board
FSLT	Federal, State, Local, and Tribal
FTZ	Foreign Trade Zone

Acronym	Definition
FY	Fiscal Year
GAO	U.S. Government Accountability Office
GPRAMA	Government Performance and Results Act Modernization Act
HHS	U.S. Department of Health and Human Services
HRBE	Human Resources Business Engine
HRM	Office of Human Resources Management
ICE	U.S. Immigration and Customs Enforcement
IE	Immediate Exportation
IFT	Integrated Fixed Tower
IMF	International Mail Facility
ISC	Interagency Security Committee
ISF	Importer Security Filing
ISR	Intelligence, Surveillance, and Reconnaissance
IT	Information Technology
JICMS	Joint Integrity Case Management System
JRC	Joint Requirements Council
LER	Labor and Employee Relations
LESC	Law Enforcement Officer Safety and Compliance Directorate
LSS	Laboratories and Scientific Services
NII	Non-Intrusive Inspection
NTC	National Targeting Center
NVC	National Vetting Center
NVOCC	Nonvessel Operating Common Carriers
NYFO	New York Field Office
O&S	Operations and Support
OCC	Office of Chief Counsel
OFO	Office of Field Operations
OI	Office of Intelligence
OIG	Office of Inspector General
OIT	Office of Information Technology
OPCON	Operational Control
OPR	Office of Professional Responsibility
OPS	Operations Directorate
OS	Operations Support
OT	Office of Trade
OTD	Office of Training and Development
PARE	Planning Analysis Requirements & Evaluation Directorate
PBG	Patrol Border Group
PC&I	Procurement, Construction, and Improvements

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Acronym	Definition
POA&M	Plan of Action and Milestones
POC	Point of Contact
POE	Port of Entry
PSPPH	Physical Security Policy and Procedures Handbook
RFD	Request for Development
RVSS	Remote Video Surveillance Systems
SAMEPH	Seized Asset Management and Enforcement Procedure Handbook
SIP	Self-Inspection Program
SME	Subject Matter Expert
SOP	Standard Operating Procedure
SWB	Southwest Border
SWS	Single Window Sustainment
T&E	Transportation and Exportation
TCO	Transnational Criminal Organization
TVPRA	Trafficking Victims Protection Reauthorization Act of 2008
UAC	Unaccompanied Alien Children
UAS	Unmanned Aerial System
UGS	Unattended Ground Sensors
USBP	U.S. Border Patrol
USCIS	U.S. Citizenship and Immigration Services
USPS	U.S. Postal Service
VADER	Vehicle and Dismount Exploitation Radar
WMDD	Weapons of Mass Destruction Division

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Appendix B. List of Open U.S. Government Accountability Office (GAO) and Office of Inspector General (OIG) Recommendations Regarding Border Security

OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
USBP	GAO-09-824	Establish internal controls for management oversight of the accuracy, consistency, and completeness of checkpoint performance data.	CBP provided GAO with its Traffic Checkpoint Policy, draft Checkpoint Operation Manual, Chief's memorandum on limiting operational vulnerability, Chief's memorandum on checkpoint data integrity, and Chief's memorandum on the UTEP & BORDERS checkpoint study. In addition, CBP has established a checkpoint program management office. CBP accomplished all the milestones by November 2016, and CBP continues to work with GAO to close the recommendation. On June 13, 2018, the revised checkpoint policy was submitted for final review and approval.
USBP	GAO-09-824	Implement the quality of life measures that have been identified by the Border Patrol to evaluate the impact that checkpoints have on local communities. Implementing these measures would include identifying appropriate data sources available at the local, state, or federal level, and developing guidance for how data should be collected and used in support of these measures.	The requirements have been drafted and sent to U.S. Border Patrol's (USBP) Enforcement Systems Division (ESD) to update metrics on the Border Patrol Enterprise Reporting Tool (BPERT) page for visibility to the field. The report is built but pending internal vetting/ approval prior to being pushed out to E3.
USBP	GAO-09-824	In connection with planning for new or upgraded checkpoints, conduct a workforce planning needs assessment for checkpoint staffing allocations to determine the resources needed to address anticipated levels of illegal activity around the checkpoint.	CBP continues to address this recommendation. The beta version of the Patrol Border Staffing Model was completed and fielded at the Chief Patrol Agent's conference in July 2018. This model examines the relationship of workload and conditions per Patrol Border Group (PBG) agent; provides beta version information regarding effects of workload (e.g., flow, apprehensions, seizures, other agency calls, sensor hits) and conditions (e.g.,

OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
			miles of border without barrier, total area of responsibility, surveillance score) on staffing levels; examines minimal to current staffing requirements; and provides relationships of workload and conditions to the Essential Mission Function staffing level. CBP developed work studies to lay the groundwork for developing staffing model/tools. These studies provide the factors, data, and analyses that determine how the staffing model and tools will be constructed. PBG and Sector Intelligence Unit work studies have been completed at all sectors. Special operations work studies with the Special Operations Group, and all sectors with Special Operations Division have been completed. Resulted in enhanced online surveys for data collection on all sectors and stations. The remaining work studies will be conducted for the following: Operational Programs and Mission Readiness Operations personnel. The initial work study version for Operational Programs and Mission Readiness Operations personnel were reviewed at the onsite visits in the Miami (August) and Rio Grande Valley Sectors (September). The online version is underway. CBP continues to collect data to develop and implement models for additional essential mission functions.
USBP	GAO-09-824	Use the information generated from the quality of life measures to inform resource allocations and address identified impacts.	The requirements have been drafted for USBP's ESD to capture criminal aliens apprehended at checkpoints. The number of drugs/narcotics apprehended at checkpoints has been integrated within BPERT for each sector. The Checkpoint Management Office will monitor the data and an informational page will be auto-

OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
			generated for sectors to have visibility. The report is built but is pending internal vetting/approval prior to being pushed out to E3.
USBP	GAO-14-165SU and GAO-14-368 (rec6)	Once data on asset assists are required to be recorded and tracked, analyze available data on apprehensions and seizures and technological assists, in combination with other relevant performance metrics or indicators as appropriate, to determine the contribution of surveillance technologies to its border security efforts.	CBP provided GAO with documentation from a study conducted in Nogales, Arizona, that evaluated the impact of deployed technology in relation to performance metrics and has requested closure of the recommendation. CBP sent a final response to GAO on June 5, 2018. USBP still is coordinating in its ESD on the report function. USBP has developed multiple ways to track technical assists in the Enforce (e3) system and the Tracking and Sign Cutting Modeling system. Additionally, USBP has developed a tool to quantify better contributions of surveillance technologies to its border security efforts. This document serves as the current process in which USBP determines how technology is deployed/tracked with the timeline for the remaining implementation.
USBP	GAO-15-521 (rec 4)	To better ensure that DHS complies with TVPRA [Trafficking Victims Protection Reauthorization Act of 2008] requirements for training, screening, and transferring UAC to HHS [the Department of Health and Human Services], we recommend that the Secretary of Homeland Security direct the Commissioner of U.S. Customs and Border Protection [CBP] to develop and implement guidance on how Border Patrol agents and OFO [Office of Field Operations] officers are to implement the TVPRA requirement to transfer to HHS all Canadian and Mexican UAC who are victims of a severe form of trafficking in persons.	CBP continues to address the recommendation. CBP Office of Policy updated the Form 93. With the revised Form 93 now issued, CBP's OFO and USBP, in consultation with CBP's Office of Chief Counsel (OCC) and Office Training and Development (OTD), will collaborate to develop, deconflict, and revise training consistent with requirements under TVPRA, specifically outlining rules to identify and screen unaccompanied alien children (UAC). This training will emphasize the importance of: (1) properly identifying a juvenile as a UAC, (2) processing for appropriate removal proceedings for a UAC, and (3) if the UAC is from a contiguous country,

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OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
			when that UAC may be permitted to withdraw his or her application for admission or voluntarily return. TVPRA training will address the notification timeline further, transfer the process to HHS, and properly record previously stated factors and the overall care given to the UAC.
OFO	GAO-15-521 (rec 1)	To better ensure that DHS complies with TVPRA requirements for training, screening, and transferring UAC to HHS, we recommend that the Secretary of Homeland Security direct the Commissioner of U.S. Customs and Border Protection to develop and implement TVPRA training for OFO officers at airports who have substantive contact with UAC.	CBP OFO no longer is pursuing a separate train-the-trainer course for CBP officers at air ports of entry (POE). The new course in development is a collaborative effort between OFO and USBP, in consultation with OCC, and in partnership with OTD, to develop, deconflict, and revise training consistent with requirements under the TVPRA, specifically outlining rules to identify and screen UAC. This training will emphasize the importance of: (1) properly identifying a juvenile as a UAC, (2) processing for appropriate removal proceedings for a UAC, and (3) if the UAC is from a contiguous country, when that UAC may be permitted to withdraw his or her application for admission or voluntarily return. TVPRA training will address the notification timeline further, transfer the process to HHS, and properly record previously stated factors and the overall care given to the UAC.
USBP	GAO-15-521 (rec 5)	To better ensure that DHS complies with TVPRA requirements for training, screening, and transferring UAC to HHS, we recommend that the Secretary of Homeland Security direct the Commissioner of U.S. Customs and Border Protection to ensure that Border Patrol agents document the basis for their decisions when assessing screening criteria related to (1) an unaccompanied alien child's ability to make an independent	CBP continues to address the recommendation. CBP Office of Policy collaborated with USBP, as well as the CBP OCC and OFO to update the Form 93 to capture the required information. This screening tool provides a mechanism for officers and agents to screen UAC consistently and thoroughly. This tool contains sections relating to the UAC's fear of return to their country

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OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
		decision to withdraw his or her application for admission to the United States, and (2) whether UAC are victims of a severe form of trafficking in persons.	of nationality or last habitual residence as well as indicators of human trafficking. For UAC who are nationals or habitual residents of a contiguous country, it also addresses the UAC's ability to make an independent decision to withdraw their application for admission. This form's use is consistent with the requirements of TVPRA. With the revised Form 93 now issued, USBP can begin to code its database to capture the updated information from the Form 93.
USBP	GAO-15-521 (rec 3)	To better ensure that DHS complies with TVPRA requirements for training, screening, and transferring UAC to HHS, we recommend that the Secretary of Homeland Security direct the Commissioner of U.S. Customs and Border Protection to provide guidance to Border Patrol agents and OFO officers that clarifies how they are to implement the TVPRA requirement to transfer to HHS all Mexican UAC who have fear of returning to Mexico owing to a credible fear of persecution.	CBP continues to address the recommendation. CBP Office of Policy updated the Form 93, in accordance with recommendation 2. With the revised Form 93 now issued, CBP OFO and USBP, in consultation with CBP OCC and OTD, will collaborate to develop, deconflict, and revise training consistent with requirements under TVPRA, specifically outlining rules to identify and screen UAC. This training will emphasize the importance of: (1) properly identifying a juvenile as a UAC, (2) processing for appropriate removal proceedings for a UAC, and (3) if the UAC is from a contiguous country, when that UAC may be permitted to withdraw his or her application for admission or voluntarily return. TVPRA training will address the notification timeline further, transfer the process to HHS, and properly record previously stated factors and the overall care given to the UAC.
USBP	GAO-17-66	The Chief of Border Patrol should strengthen the methodology for calculating recidivism such as by using an alien's apprehension history beyond one fiscal year and excluding aliens for whom there	CDS-PMO has started to include the national multiple year recidivism rate in its quarterly power points that are sent to the sectors. USBP continues to work with GAO to provide further

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OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
		is no record of removal and who may remain in the United States	information to close out the recommendation.
USBP	GAO-17-66	The Chief of Border Patrol should revise CDS guidance to ensure consistent and accurate methodologies for estimating Border Patrol costs across consequences and to factor in, where appropriate and available, the relative costs of any federal partner resources necessary to implement each consequence	The costs associated with federal partners is not included in the CDS-PMO's cost of apprehension factor, as it does not impact USBP resources. CDS is a USBP specific program designed to analyze costs incurred by USBP from the time of processing to the time the alien is no longer in USBP's custody. During the annual reevaluations, USBP sector personnel stated that they do not include consequence costs applied by other agencies. CBP has submitted documentation for closure of this recommendation.
OFO	GAO-16-646SU/ GAO-17-216	To better ensure the effectiveness of CBP's predeparture programs, we recommend that the Commissioner of U.S. Customs and Border Protection develop and implement a system of performance measures and baselines to evaluate the effectiveness of CBP's predeparture programs and assess whether the programs are achieving their stated goals.	CBP OFO has undertaken a number of steps to act upon the recommendations in the referenced January 2017 GAO Report. OFO assembled a working group, comprising senior program managers from each of its predeparture and prescreening programs to perform a review of program activities, surveyed all available predeparture/prescreening program-related operational data, and select the data elements that would provide reliable information regarding program execution and performance over time. In October 2017, the working group used these data to formulate three high-level, cross-program performance measures that consolidate this information and incorporate the interdependencies inherent in these programs. In February 2018, OFO began assembling the data elements required to support the fiscal year (FY) 2018 baseline year calculation of the three high-level, cross-program performance measures. OFO has

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			initiated the computation process for the three new tracking and reporting measures for activity during FY 2018 covering the period October 1, 2017, through September 30, 2018. OFO estimates this process will be complete by December 31, 2018. Collected data and results will be reviewed with subject matter experts (SME) to identify any outstanding issues relating to accuracy or data reliability.
AMO	GAO-17-152 (rec 1)	Develop and document procedures for Predator B coordination among supported agencies in all operating locations.	CBP continues to address the recommendation. To date, CBP has established a path forward to enhance tasking coordination.
AMO	GAO-17-152 (rec 3)	Provide training to users of CBP's data collection system for Predator B missions.	CBP continues to address the recommendation and, to date, has completed the following milestones: developing a schedule for Air and Marine Operations (AMO) Headquarters personnel to conduct training at each Predator B location.
AMO	GAO-17-152 (rec 2)	Update and maintain guidance for recording Predator B mission information in its data collection system.	CBP continues to address the recommendation and, to date, has completed the following milestones: began updating its system of record to record Predator B mission data; and developed a phased approach to disseminate guidance as new functionality is incorporated into the system.
USBP	GAO-17-167SU / GAO-17-331	Develop and implement written guidance to include roles and responsibilities for the steps within its requirements process for identifying, funding, and deploying tactical infrastructure assets for border security operations.	CBP developed the USBP risk management process with six stages that help establish requirements: strategic guidance, mission analysis, planning, execution, assessment, and lifecycle management; conducted a baseline analysis that provided greater ability to consider all solutions for comprehensive border security analysis. USBP Operational Requirements Management Division and Planning and Measures Division coordinated work on establishing

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			measures that gauge our impedance and denial as part of Operational Control (OPCON). The measures taxonomy that was created looks at USBP's ability to impede or deny illegal border crossings. In June USBP established the initial measures framework for impedance and denial within the taxonomy and traveled to San Diego Sector to brief local leadership and two stations, Imperial Beach and Brownfield, for feedback on the measures. Both stations believed that the impedance and denial measures were applicable and an appropriate way to measure impedance and denial capability. The internal operating procedures have been completed and issued. CBP has submitted documentation for closure of this recommendation.
USBP	GAO-17-167SU / GAO-17-331	Develop metrics to assess the contributions of pedestrian and vehicle fencing to border security along the southwest border using the data Border Patrol already collects and apply this information, as appropriate, when making investment and resource allocation decisions.	CBP continues to address the recommendation. USBP is implementing the OPCON framework across all Southwest Border (SWB) sectors, allowing USBP to develop baseline values for OPCON for all SWB line stations. The framework is composed of three elements: impedance and denial; situational awareness; and response and resolution. To date, CBP has established an initial taxonomy for impedance and denial, established an initial taxonomy methodology, conducted a pilot, analyzed pilot results, and briefed USBP leadership on the results. CBP will begin to conduct OPCON framework implementation in additional sectors.

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AMO	GAO-17-205SU & GAO-17-474 (rec 3)	That the Secretary of Homeland Security direct the Commissioner of CBP to assess and document how the alternative technological solutions being considered will fully meet operational needs related to ultralight aircraft.	CBP continues to address the recommendation. To date, CBP has developed the necessary DHS requirements documentation and conducted a geospatial radar coverage analysis.
AMO	GAO-17-205SU & GAO-17-474 (rec 5)	That the Secretary of Homeland Security direct the Commissioner of CBP to establish and monitor performance targets related to ultralight aircraft.	CBP continues to address the recommendation and, to date, has completed the following milestones: implemented an internal collaborative effort to develop a joint AMO and USBP performance measure and targets for interdicting ultralight aircraft.
USBP	GAO-17-205SU & GAO-17-474 (rec 2)	That the Secretary of Homeland Security direct the CBP-U.S. Immigration and Customs Enforcement [ICE] tunnel committee to convene and establish standard operating procedures [SOP] for addressing cross-border tunnels, including procedures for sharing information.	<p>CBP continues to address the recommendation. To date, CBP has continued to implement existing procedures that support this recommendation; continued enhancing relationship with ICE; and began review of SOPs to identify areas of improvement.</p> <p>USBP is looking actively for standardization opportunities for the tunnel threat environment. This will create opportunities to focus on the processes of detection, interdiction, mapping, and remediation of cross-border tunnels. The first standardization on which USBP is focusing is training. USBP Headquarters is detailing an SME from the Tunnel Patrol Group at Nogales Station to the USBP HQ Training Group. This agent will be compiling the first-ever Tunnel Identification Class. USBP is working with the USBP Basic Academy to have this class included (upon completion) in the Post Academy Training for all Border Patrol agents. This will ensure that all new agents get consistent training</p>

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			<p>on indications of tunneling activity and actions to take when the activity is observed. USBP is working with the CBP Advanced Training Center to ensure that this class will be available to all current Border Patrol agents.</p> <p>(b) (7)(E)</p>

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			(b) (7)(E) (b) (7)(E) Recently, a second Assistant Chief position was added to the USBP Headquarters Tunnel Group. This will create the opportunity for more coordination with ICE at the Headquarters level regarding cross-border tunnel interdictions and investigations.
OFO	GAO-17-419SU (rec 1)	Enforce the 10+2 rule requirement that carriers provide container status messages (CSM) to CBP when targeters identify CSM noncompliance.	On April 12, 2018, CBP published a final rule titled, "Definition of Importer Security Filing Importer," in the Federal Register (83 FR 15736). The final rule broadened the definition of Importer Security Filing (ISF) Importer for foreign cargo remaining on board (FROB) shipments to include nonvessel operating common carriers (NVOCC), immediate exportation (IE), transportation and exportation (T&E) in-bond cargo, and foreign trade zone (FTZ) cargo (ISF-5 filings). The broader definition of ISF Importer generally removes the ambiguity that existed in the previous regulatory language with regard to who is responsible for certain ISF-5 filings. This clarification allows CBP to enforce the requirements of the ISF rule comprehensively. The ISF rule requires importers and vessel-operating carriers to provide additional advance trade data on cargo shipments to CBP generally prior to vessel lading, pursuant to Section 203 of the Security and Accountability for Every Port Act of 2006 and Section 343(a) of the Trade Act of 2002.

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			<p>OFO/Cargo and Conveyance Security (CCS)/Manifest and Conveyance Security Division has worked with Enterprise Services (ES)/Office of Information and Technology (OIT) to explore the development of CSM to the trade community/carriers and the corresponding technical requirements. To create the CSM messages would involve complex programing and funding to do so. In addition, the CSMs would cause confusion and could result in more than a billion messages. The ports have the authority to enforce CSM, and the current plan is for OFO/CCS to remind the ports to do so and to provide guidance. OFO/CCS has drafted an updated CSM enforcement memo to reiterate guidance to field personnel. The memo was issued to the field in June 2018. As with the ISF-10 enforcement, CBP will take a common-sense and phased approach to enforcement. (b) (7)(E)</p> <p>(b) (7)(E)</p> <p>(b) (7)(E) ports also will be reminded that liquidated damages claims and other enforcement actions against carriers for Vessel Stow Plan and Container Status Message violations are authorized.</p>
OFO	GAO-17-419SU (rec 2)	Evaluate the Importer Security Filing (ISF) enforcement strategies used by Advance Targeting Units (ATU) to assess whether particular enforcement methods could be applied to ports with relatively low submission rates.	<p>In conjunction with the OFO, (b) (7)(E)</p> <p>(b) (7)(E) ISF enforcement strategies are discussed in the monthly ATU calls with the POEs so that best practices may be shared and</p>

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			<p>developed further. On April 12, 2018, CBP published a final rule titled, "Definition of Importer Security Filing Importer," in the Federal Register (83 FR 15736). The final rule broadened the definition of ISF Importer for FROB shipments to include NVOCCs, and IE, T&E in-bond cargo, and FTZ cargo (ISF-5 filings). The broader definition of ISF Importer generally removes the ambiguity that existed in the previous regulatory language with regard to who is responsible for certain ISF-5 filings. This clarification allows CBP to enforce the requirements of the ISF rule comprehensively. The ISF rule requires importers and vessel-operating carriers to provide additional advance trade data on cargo shipments to CBP generally prior to vessel lading, pursuant to Section 203 of the Security and Accountability for Every Port Act of 2006 and Section 343(a) of the Trade Act of 2002.</p> <p>OFO CCS has drafted an updated CSM enforcement memo to reiterate guidance to field personnel. The memo was issued to the field in June 2018. Ports were reminded that liquidated damages claims and other enforcement actions against carriers for Vessel Stow Plan and Container Status Message violations are authorized. Moving forward, liquidated damages claims for ISF violations will be initiated no later than 90 days from the date of discovery of the violation, except in instances furthering the development of criminal cases. Enforcement of the ISF-5 requirements through liquidated damages claims will begin no sooner</p>

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			than November 14, 2018, 6 months from the effective date of the rule. Ports also will be reminded that liquidated damages claims and other enforcement actions against carriers for Vessel Stow Plan and Container Status Message violations are authorized.
OFO	GAO-17-419SU (rec 3)	Identify and collect additional performance information on the impact of the 10+2 data, such as the identification of shipments containing contraband, to better evaluate the effectiveness of the 10+2 program	The OFO Directorates of CCS and (b) (7)(E) are collaborating on a plan to assess additional performance metrics to evaluate the effectiveness of the ISF program. CCS will work with the (b) (7)(E) to analyze the data from a targeting standpoint to evaluate the program for the following performance areas. They are: 1) identify the number of unmanifested containers and determine how/if they were mitigated before arrival; 2) determine the number of times that CTPAT companies were identified as ISF entity and given targeting benefits, but did not receive the same treatment because of manifest information; and 3) identify the number of times potential terrorism matches were made against ISF entities versus the number of times not matched using the same manifest data.
USBP	GAO-17-66 (rec 2)	The Chief of Border Patrol should collect information on reasons agents do not apply the CDS [Consequence Delivery System] guides' Most Effective and Efficient consequences to assess the extent that agents' application of these consequences can be increased and modify development of CDS guides, as appropriate.	CBP continues to address the recommendation and, to date, has completed the following milestones: Members of the CDS Program Management Office recently completed the annual CDS reevaluations. SMEs and sector command staff were asked to provide reasons for CDS guide deviation. Reasons provided included processing guidelines, reliance on strategic partnerships, and processing timelines. All interviewed agreed that

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			mandatory guide usage was not a realistic or achievable option.
OC-OPR	GAO-17-605SU and GAO-18-72	(FOUO/LES) Update the Security Policy and Procedures Handbook to include the Interagency Security Committee's (ISC) Risk Management Process for Federal Facilities Standard to assess all undesirable events (including three cyber-related threats), consider all three factors of risk, and document deviations from the standard.	The Physical Security Policy and Procedures Handbook (PSPPH) was disseminated for agencywide review and comment on September 30, 2018. Office of Professional Responsibility (OPR) expects to publish the final, signed version by June 30, 2019.
OC-OPR	GAO-17-605SU and GAO-18-72	Update the Security Policy and Procedures Handbook: Include data to include data collection and analysis requirements for monitoring the performance of its physical security program.	The PSPPH was disseminated for agencywide review and comment on September 30, 2018. OPR expects to publish the final, signed version by June 30, 2019.
OC-OPR	GAO-17-605SU and GAO-18-72	Revise the plan's [plan to eliminate the backlog of facility risk assessments] assumptions to balance assessments with competing priorities, such as updating the policy manual and reviewing new construction design, to develop a feasible timeframe for completing the assessment backlog.	CBP/OPR/ Security Management Division successfully has completed risk assessments of all CBP-owned facilities (minus the two under construction). As such, they are now on a cycle to be completed per the ISC standards. CBP has submitted documentation for closure of this recommendation.
OFO	GAO-17-606	CBP to, in conjunction with USPS [U.S. Postal Service], (1) establish measureable performance goals for pilot programs and (2) assess the performance of the pilots in achieving these goals.	In relation to USPS developing a solution to present to CBP-targeted international mail, USPS has agreed that the presentment rate of all CBP-targeted mail going forward will be at <div style="background-color: black; color: white; padding: 10px; text-align: center; font-size: 2em; font-weight: bold;">(b) (7)(E)</div>

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			<div>(b) (7)(E)</div> <p>In April 2018, CBP and USPS exchanged data covering the month of February 2018 for the purpose of comparing presentment rates. On May 3, 2018, CBP and USPS completed their respective reviews of the data and met to discuss findings. These finding revealed a difference of approximately 9 percent between CBP and USPS relative to the presentment rates. Discussions revealed differences in counting methodology, which could contribute to this delta. CBP and USPS agreed to look into the following identified factors that may have contributed to these differences: 1) USPS will check for updated scans in their Product Tracking and Reporting system (scanning and tracking events) and review their list with Inspection Service daily logs; and 2) CBP will have its port to review the list of mail items placed on hold and to make appropriate updates in its Automated Targeting System/Cargo Enforcement Reporting and Tracking System (CERTS) to reflect item had been examined and released. This will ensure more timely coordination between the input to the USPS Global Business System and the CBP Automated Targeting System. In relation to the development of an electronic tool to assist international mail facility (IMF) staff in managing international mail, CBP continues to work with OIT on the development of an International Mail Dashboard to assist in the tracking of CBP targeting</p>

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			activity at each IMF. This will allow CBP to compare and confirm presentment rates provided by the USPS in order to assess the performance of the mail pilots.
OFO	GAO-17-606	CBP to, in conjunction with USPS, evaluate the relative costs and benefits of collecting electronic advance data for targeting mail for inspection	CBP OFO CCS continues to work with the Economic Analysis Branch, Regulations and Rulings (EIAB) for additional guidance to address this recommendation. At a meeting between CCS and EIAB on February 2, 2018, it was determined that, because of previously scheduled assignments, EIAB would not be able to provide assistance to CCS prior to April 1. On April 17, 2018, CCS met with EIAB to provide an overview of the processing by CBP of inbound mail at the IMFs. EIAB subsequently provided a list of 21 questions/requests for additional information to assist in developing its analysis. On April 30, 2018, CCS provided a response to EIAB to address several of questions. Some of the information requested is required from the field and USPS. CCS has requested this information and is awaiting responses. CCS and USPS have provided respective responses to each of the 21 EIAB questions/requests. EIAB is in the process of reviewing these responses and subsequently has reached back to USPS for clarification on some of the information provided.
OS-LSSD	GAO-17-774SU, GAO-18-214	(U/FOUO-LES) Develop a monitoring system to help ensure that CBP officials comply with license verification policies and procedures.	CBP's Weapons of Mass Destruction Division (WMDD) has been realigned (operationally) from the Office of Intelligence (OI) to Laboratories and Scientific Services (LSS) within Operations Support (OS). Accordingly, LSS now has responsibility for Recommendations 1 and 3.

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			<p>LSS, in coordination with OFO and OT, will conduct an analytical study to develop a risk matrix and statistically valid sample size to verify companies' compliance with the NRC regulation. CBP will use the results of the analytical study to frame the monitoring system. Directive 5290-015B will be updated to include the addition of a monitoring process to ensure compliance with mandated license verification policies and procedures.</p> <p>CBP, using the results of the analytical study and a risk-based layered approach, will identify</p> <p>(b) (7)(E)</p>
OS-LSSD	GAO-17-774SU, GAO-18-214	Develop a robust system that identifies shipments of radiological material that pose the greatest risk and revise CBP's policies and procedures as necessary to verify licenses for these shipments.	<p>CBP's Weapons of Mass Destruction Division (WMDD) has been realigned (operationally) from the Office of Intelligence (OI) to Laboratories and Scientific Services (LSS) within Operations Support (OS). Accordingly, LSS now has responsibility for Recommendations 1 and 3.</p> <p>LSS, in coordination with OFO and OT, will conduct an analytical study to develop a risk matrix and statistically valid sample size to verify companies' compliance with the NRC regulation. CBP will use the results of the analytical study to frame the monitoring system. Directive 5290-015B will be updated to include the addition of a monitoring process to ensure compliance with mandated</p>

OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
			license verification policies and procedures. CBP, using the results of the analytical study and a risk-based layered approach, will identify shipments that are high risk or may pose a high risk (b) (7)(E) (b) (7)(E)
ES-OFAM	GAO-18-11	The Commissioner of CBP should develop and implement a policy and related guidance for documenting arrangements with landowners, as needed, on Border Patrol's maintenance of roads it uses to conduct its operations, and share these documented arrangements with its sectors.	Facilities Management and Engineering Office (FM&E) and USBP collaborated on the development of new processes, adapting existing guidance to current organizational needs, and utilized lessons learned to make the guidance successful for the organization. The updated policy defines coordination with landowners, where landowner agreements will be stored, POCs for questions, and procedures associated with the coordination with landowners for road maintenance. Additionally, recurring calls with the real estate and environmental team, USBP headquarter representative, Sector representatives, and program management have been developed to ensure transparent and clear communication of requirements, clearance status, and upcoming contract activities. The Real Property Requirements Management Policy was finalized on July 31, 2018.
USBP	GAO-18-11	The Commissioner of CBP should clearly document the process and criteria for making decisions on funding non-owned operational requirements and communicate this process to Border Patrol sectors.	The USBP and FM&E team is finalizing the process for maintenance and repair of roads and have draft guidance for the field that has not been finalized. USBP and FM&E will work to complete the process by the end of October 2018. USBP and FM&E developed the first iteration of

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			a prioritization process that was deployed as a pilot for prioritization of FY 2018 new roads. Through collaborative meetings and in coordination with the field, they identified key best practices and developed a prioritization process that considers three pillars: qualitative, quantitative, and feasibility. Through the pilot, sectors prioritized their new road requirements and tied those requirements back to their capability gap analysis submissions by referencing a core-card for each requirement. The criteria were developed and leveraged from best practices used at the sectors and after the Border Wall Decision Support Tool. Through this pilot, USBP was able to compile each sector's top new road requirements for national prioritization at USBP Headquarters. As of August 11, 2018, USBP and Office of Facilities and Asset Management are continuing work on refining the prioritization methodology and will be expanding it to prioritizing maintenance and repair requirements. A prioritization tool and guidance are in draft.
USBP	GAO-18-11	The Commissioner of CBP should assess the feasibility of options for addressing the maintenance of nonfederal public roads. This should include a review of data needed to determine the extent of its reliance on non-owned roads for border security operations.	The USBP and FM&E team is finalizing the process for maintenance and repair of roads and have draft guidance for the field that has not been finalized. USBP and FM&E will work to complete this process by the end of October 2018.
OS-LSSD	GAO-18-205	The Commissioner of CBP should, in consultation with the Executive Director of CBP's LSSD and the Laboratory Directors, assess volume and risk at each port of entry to determine those with the greatest need for resources, use this information as a basis for staff allocations, and document its risk-based, staff allocation process to	CBP continues to address the recommendation. LSS has been engaged fully with OFO at the (b) (7)(E) (b) (7)(E) (b) (7)(E) providing daily onsite scientific and forensic support through (b) (7)(E) LSS, in

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		ensure that CBP and LSSD priorities can be accomplished as effectively and efficiently as possible.	coordination with OFO, is now assessing (b) (7)(E) to evaluate the impact of (b) (7)(E) (b) (7)(E) and to determine the best utility and allocation of LSS resources at (b) (7)(E) (b) (7)(E) A draft report of findings and recommendations will be completed by November 9, 2018. On October 1, 2018, LSS activated the 24/7 Narcotics Reachback Center for presumptive analysis and technical advice. Additionally, the (b) (7)(E) at the LSS (b) (7)(E) activated on October 1, 2018. LSS is working closely on a risk model to inform resource allocations and anticipates the completion of a draft model by November 9, 2018. Final assessments and evaluations from site visits, discussions, and (b) (7)(E) are progressing and will be concluded by November 9, 2018, with a draft report of findings and recommendations for resource allocations.
Trade	GAO-18-271	The Secretary of Homeland Security should ensure that the Commissioner of CBP, in collaboration with partner agencies, finalizes an interagency approach to the post-core management of ACE [Automated Commercial Environment] that includes (1) processes for prioritizing enhancements to ACE and for sharing ACE operations and maintenance and development costs, including the costs of suggested enhancements among partner agencies that may benefit, and (2) time frames for implementing such processes.	CBP, in collaboration with partner agencies, finalized an interagency approach to the post-core management of ACE. The Border Interagency Executive Council (BIEC) finalized the ACE PAYGO Model; a cost-sharing model and prioritization process for all ACE Single Window enhancements, identified as the "Single Window Sustainment (SWS) Planned Pay-As-You-Go Model." The approved SWS Planned PAYGO Model and associated prioritization process has been implemented fully. The BIEC has conducted two

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			<p>successful prioritization sessions, prioritizing a total of 26 Requests for Development (RFD). Prioritization sessions will continue for the remaining RFDs quarterly.</p> <p>CBP considers the GAO recommendation mitigated and completed because the process has been approved by the BIEC and has been implemented fully. CBP has submitted a request for closure to GAO.</p>
ES-OA	GAO-18-489SU, GAO-18-614	Analyze the costs associated with future barrier segments and include cost as a factor in the Impedance and Denial Prioritization Strategy	On September 26, 2018, CBP provided the signed approved documentation from the Border Wall System Program Annex B Excursion 1 for the secondary barrier for the San Diego Sector to GAO, and noted that it is Annex B, not Appendix B, as noted in the July update. CBP considers this action to be completed, and requested that GAO consider this recommendation resolved and closed, as implemented.
ES-HRM	GAO-18-487	Commissioner of CBP should ensure that its operational components systematically collect and analyze data on departing law enforcement officers and use this information to inform retention efforts.	<p>CBP agrees that high-quality exit survey data are essential to support and inform retention efforts. In May 2018, CBP's Office of Human Resources Management formed a workgroup tasked with the development of custom questions for a CBP-wide exit survey. The workgroup comprised representatives from across the agency, which included the Office of the Commissioner, OFO, USBP, AMO, OT, OS, Enterprise Services, Congressional Affairs, OPR, and the Office of Public Affairs.</p> <p>The workgroup initially reviewed the USBP-specific exit survey as the foundation for the CBP-wide exit survey. They also considered employee exit survey research and</p>

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			<p>CBP office-specific information needs. The survey was launched on August 17, 2018.</p> <p>POCs were established across CBP in each office to assist in communicating the launch of the new survey. The POCs are available to answer any questions from supervisors or exiting employees about the survey. On September 10, 2018, an announcement and link to the survey was included in the weekly CBP Central message broadcast across the agency. Immediately following that message, exit survey POCs were encouraged to send an email announcement regarding the launch of the survey to their staff. POC's were provided with sample email language and a guide for supervisors, which detailed all the steps of the off-boarding process so that they could encourage exiting employees to complete the survey.</p> <p>The first announcement of the exit survey response rates were sent to the POCs on October 2, 2018. The response rates were broken out by office. POCs were encouraged to continue messaging about the exit survey in order to increase the response rate. Survey response rates will be sent to the POCs biweekly until further notice.</p> <p>The exit survey working group currently is working on embedding a link to the exit survey on the Separations and Clearance Form, CBP Form 241, in order to facilitate further the easy completion of the exit survey during the off-boarding process. Additional avenues for automation of the off-boarding process currently are being researched, and, if appropriate, more</p>

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			automation of exit survey notifications to exiting employees will be included.
OC-OPR	GAO-18-405	Revise policy or guidance to ensure documentation of required control activities in its case management system, such as legal review of adverse actions, and data verification.	<p>The CBP OPR Investigative Operations Division is in the process of creating and implementing procedures for the use of a Data Verification Checklist for OPR Investigations that will assist OPR in verifying the data contained in the Joint Integrity Case Management System (JICMS) are complete and accurate.</p> <p>As for the legal review of adverse actions, this responsibly falls with the Labor and Employee Relations (LER), within the Office of Human Resources Management (HRM). OCC conducts a legal review of all adverse actions, and LER documents this review in its Human Resources Business Engine (HRBE).</p>
OC-OPR	GAO-18-405	Require staff to document investigative findings (e.g., whether an allegation is substantiated) in the case management system, and document and disseminate associated referral procedures for adjudication.	Currently, OPR investigative findings are documented in OPR's reports of investigation that are uploaded in both JICMS and HRBE. However, under CBP's uniform discipline procedure, the final determination as to whether an allegation is substantiated is a management determination, made after OPR has referred the case to LER for review and action. In HRBE, LER documents the misconduct that the proposing official has determined is actionable, along with the misconduct the deciding official substantiated. OPR will document and disseminate associated referral procedures for adjudication by developing internal protocols establishing when and how cases should be referred to LER for adjudication.
OC-OPR	GAO-18-405	Ensure the appropriate program offices include evaluating and testing internal	OPR and HRM will continue to work with the CBP's Management

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OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
		controls related to the employee misconduct process in CBP's annual self-inspection program.	Inspections Division to develop Self-Inspection Program (SIP) worksheets for inclusion in the FY 2019 SIP cycle to evaluate and test internal controls related to specific roles in the employee misconduct process.
OC-OPR	GAO-18-405	Monitor the duration of all cases beginning-to-end by stage and by case type.	Data that would allow for the monitoring of the duration of all cases beginning-to-end by stage and by case type is maintained in two case management systems, OPR's JICMS and HRM's HRBE. HRBE provides a complete audit trail for each case from date of receipt by HRM to the date of closure and also identifies the stages at each point in the HRBE audit trail. OPR currently is working on the modernization of JICMS that includes a detailed case audit trail for better monitoring of cases beginning-to-end by stage and by case type. Once implemented, OPR will work to relaunch the OPR Executive Dashboard. Because the data needed to monitor all cases beginning-to-end are maintained in two separate systems, OPR and HRM will work together to develop a comprehensive dashboard to monitor the duration of all cases from beginning to end.
OC-OPR	GAO-18-405	Monitor the timeliness of misconduct cases according to established targets for management inquiries, administrative inquiries, and criminal and non-criminal investigations using case management system data.	Monitoring the timeliness of misconduct cases according to established targets for various case types using case management system data is linked to the comprehensive Executive Dashboard discussed in Recommendation #4. Captured data will be used to generate reports allowing OPR Headquarters and local OPR management to review and monitor timeliness. OPR and HRM will work together to ensure that the Dashboard monitors timeliness of misconduct cases.

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OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
OC-OPR	GAO-18-405	Define and document the case management system data fields to be used for monitoring all established performance targets and provide related guidance to staff.	OPR will define clearly the data fields used to measure performance within the Executive Dashboard. Once developed, OPR will provide the appropriate guidance to staff.
OS-PARE	GAO-18-550	The Commissioner of Customs and Border Protection through the Executive Assistant Commissioner for Operations Support finalizes and promulgates the Customs and Border Protection's draft policy for requirements development.	CBP OS Capabilities and Requirements Division's (CRD) Operational Capabilities and Requirements Development Directive is complete and was signed by the Deputy Executive Assistant Commissioner (D/EAC), OS on October 11, 2018. The OS D/EAC is an authorized representative of the Component Requirements Executive as outlined in the Component Requirements Executive Delegation Order dated January 3, 2018.
OS-PARE	GAO-18-550	The Commissioner of Customs and Border Protection through the Executive Assistant Commissioner for Operations Support updates the 2013 workforce assessment to account for the independent requirements organization's current workforce needs.	The Commissioner of CBP, through the Executive Assistant Commissioner for OS, updates the 2010 workforce assessment to account for the independent requirements organization's current workforce needs. The workforce assessment was reviewed and approved on October 11, 2018 by the Executive Director, Planning Analysis Requirements & Evaluation Directorate, OS (OS/PARE). The Executive Director OS/PARE is an authorized representative of the Component Requirements Executive as outlined in the Component Requirements Executive Delegation Order dated January 3, 2018.
OS-PARE	GAO-18-550	The Commissioner of Customs and Border Protection through the Executive Assistant Commissioner for Operations Support establishes component specific training for requirements development.	CBP's CRD completed the first working-level training course on March 12-16, 2018, the second on April 30-May 4, 2018, and the third on June 18-22, 2018. A fourth course was delivered as specific modules on Capability Analysis Reports and Operational Requirements Documents (vice the entire week-long

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OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
			curriculum) based on the needs of the Agency at the time. CRD also currently is condensing the curriculum for delivery at the Executive Level. We request that GAO consider this recommendation resolved and closed, as implemented. August 2018 Update: The course development concluded, and CRD has executed multiple iterations. CRD also has started a rolling curriculum addressing specific segments of the training in 1.5-2 hour blocks. This delivery method initially targeted internal CRD resources, but was made available to a broader CBP audience beginning in September 2018. CBP considers this recommendation completed and has requested closure.

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OFFICE OF INSPECTOR GENERAL REPORTS

OFFICE	AUDIT	RECOMMENDATION	STATUS
USBP	OIG-12-132	The OIG recommends that the Chief, U.S. Border Patrol complete the planned Concept of Operations document describing how the identified capabilities need to function from a cross-component perspective to support the Analysis of Alternatives for the Tunnel Detection and Technology Program.	CBP continues to address the recommendation and, to date, has completed the following milestones: USBP is working toward the creation of a draft operational requirements document to detect capability gaps for the Cross-Border Tunnel Threat (CBTT) program. This draft document will be used to support the analysis of alternatives, which has been paused temporarily. The CBTT integrated master schedule provides that the concept of operations is complete and is in the review/signature cycle. Once the necessary signatures are obtained, it will be submitted to the Joint Requirements Council (JRC), which has 20 days to review and comment. If changes are recommended, CBTT has 10 days to respond and return them to the JRC. Barring any unforeseen circumstances, the process will be completed by November 30, 2018.
OS-LESC	OIG-13-114	Develop a formal process to evaluate use of force training field audit results and follow up on field audit recommendations.	CBP has addressed the recommendation. CBP completed FY 2018 visits to the field; finalized the development of an automated process that allows CBP management to evaluate use of force training audit results and follow up on field audit recommendations; and developed a requirements document specifying the capabilities and functionality of the SharePoint site and forms.
USBP	OIG-17-114	Chief of the U.S. Border Patrol, in collaboration with the Assistant Commissioner for OIT: Complete modernization plans for the e3 system to ensure adequate availability and functionality to support border security mission needs	USBP included the modernization plan in the Border Patrol Enforcement System (BPES) narrative for the FY19 Business Case. Additionally, USBP estimated initial Fiscal Year 2018 funding requirements for preliminary modernization planning. USBP is on track to identify and develop key artifacts to support Joint Requirements Council (JRC) requirements. USBP

OFFICE	AUDIT	RECOMMENDATION	STATUS
			will work with the CBP, Office of Acquisition to schedule an Acquisition Decision Event (ADE) – 1 for the BPES Modernization by December 31, 2018. The USBP Enforcement Systems Division (ESD) completed the Capability Analysis Study Plan (CASP) in November 2017, and finished the Capability Analysis Report (CAR) in April 2018. The document is currently working through CBP channels to the DHS JRC. The ESD has completed the p-MNS for internal CBP review. The ESD will complete the p-CONOPS by October 31, 2018.
ES-OFAM	OIG-17-115-MA	CBP promptly upgrade the infrastructure at Tucson Sector stations and ensure Border Patrol agent safety by providing the resources necessary to correct the urgent physical security issues.	CBP continues to address the recommendation: (b) (7)(E) (b) (7)(E)
ES-OFAM	OIG-17-115-MA	CBP review the security policy and procedures at Border Patrol stations and CBP facilities in the Tucson Sector to (b) (7)(E)	CBP continues to address the recommendation: (b) (7)(E) (b) (7)(E) (b) (7)(E) are projected for completion by March 31, 2019. CBP is in the process of pursuing two like-for-like direct leases by December 31, 2018. The leases will address additional or changed security improvements.
ES-OIT	OIG-18-19	Ensure that the TECS test environment is sufficiently similar to the TECS production environment so that testing scenarios will be able to identify errors caused by processing a large volume of queries.	CBP continues to address the recommendation. To date, CBP has completed the TECS system assessment of the current architecture and finalized the cloud infrastructure for a representative TECS system to include a test environment.

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OFFICE	AUDIT	RECOMMENDATION	STATUS
ES-OIT	OIG-18-19	Provide the DHS Chief Information Officer [CIO] with a weekly status of CBP's planned and actual modernization migration schedule and milestones detailing when (a) the Legacy mainframe environment is no longer needed, and (b) the recovery site is fully functional.	CBP continues to address the recommendation as it continues to report status information to the DHS CIO via the INVEST report. Reporting will continue although legacy mainframe environment no longer is needed.
OC-OPR	OIG-18-18	CBP should update the Special Agent Internal Operating Procedures immediately to reflect the guidance on the use of Section 1509 Summonses provided in the May 25, 2017 email referenced in this report from the Executive Director of CBP OPR's Investigative Operations Division.	The Internal Operating Procedures Chapter to reflect the guidance on the use of Section 1509 Summonses was drafted and submitted to OCC for review and clearance. It is pending return from OCC.
OC-OPR	OIG-18-18	The relevant CBP personnel should receive training on the proper use of Section 1509 Summonses as soon as practicable.	The training materials on the use of Section 1509 Summonses were drafted and submitted to OCC for review and clearance. The materials are pending return from OCC.
OC-OPR	OIG-18-18	CBP should look at use of Section 1509 Summonses across the agency to determine how such summonses are being used, and whether such uses comport with the law and CBP's updated policy.	The responses received from components on the use of the Section 1509 Summonses were sent to the OCC for review. OCC completed its review, and documentation was submitted to request closure of this recommendation.
OC-OPR	OIG-18-68	Develop and implement a formal policy for the complaint review and response process.	CBP OPR conducted a comprehensive internal review of the processes and procedures utilized to review and respond to polygraph complaints. The review confirmed the need for a comprehensive policy, which formalized the manner in which the agency addresses complaints about polygraph exams. Following the review, CBP OPR developed a policy, which addresses all facets of the complaint review and response process. It provides the required level of oversight while ensuring reviews and responses are conducted in an

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OFFICE	AUDIT	RECOMMENDATION	STATUS
			<p>efficient, objective, and thorough manner.</p> <p>On August 13, 2018, OPR implemented the “Standard Operating Procedures: Responding to Polygraph Exam Complaints,” formalizing CBP’s polygraph complaint review and response process. Additionally, to provide increased public visibility and transparency of the complaint process, OPR added the following questions and answers to the frequently asked questions’ polygraph portion of CBP’s public facing website (https://www.cbp.gov/careers/car/poly)</p> <p>On the basis of the above information and the SOPs, OPR has requested closure of recommendation two as well as closure of the OIG’s audit, via the 90-Day Update to the Office of Accountability dated September 19, 2018.</p>
OS-LESC	OIG-18-76	Provide recurring familiarization training on official assault reporting systems.	CBP’s Law Enforcement Officer Safety and Compliance Directorate (LESC) continues to address the milestones to achieve complete implementation of the recommendation. On schedule to complete the implementation plan by December 31, 2018.
OS-LESC	OIG-18-76	Clarify guidance on the types of assaults that must be officially reported, as well as the steps in the reporting process.	CBP LESC continues to work on the milestones to achieve complete implementation of the recommendation. On schedule to achieve a complete implementation by December 31, 2018.
OS-LESC	OIG-18-76	Mandate that law enforcement officers complete refresher training quarterly, including training on individual threat assessments (to include pre-assault recognition), assault mitigation	CBP LESC continues to address the milestones to achieve complete implementation of the recommendation. On schedule to complete the implementation by March 31, 2019.

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		techniques, defensive tactics training, and scenario-based training exercises	
ES-OIT	OIG-18-79	Develop a process for ensuring all information systems are included in the CBP Office of Information Technology inventory, along with notification to the CBP Privacy and Diversity Office when a system is added.	<p>OIT will develop a process for ensuring all information systems are included in the official CBP OIT's Federal Information Security Management Act (FISMA) system inventory.</p> <p>CSD Security Operations Center/Vulnerability Assessment Team will begin tracking rouge assets on the CBP network and will create a dashboard showing detected unauthorized systems. The report will highlight decentralized servers and systems without the Tanium agent.</p> <p>CBP OIT will reach out to CBP's Privacy and Diversity Office to discuss its role and inclusion in the updated FISMA Inventory SOP.</p> <p>CBP OIT will update the FISMA Inventory SOP and will draft memoranda to the CBP community regarding security compliance communication failures in the implementation of "rogue" systems on the CBP network.</p>
AMO	OIG-18-79	Provide a plan, including timelines, for fulfilling supporting requirements and obtaining authorization to operate ISR [intelligence, surveillance, and reconnaissance] Systems.	AMO is developing a number of documents needed to obtain an authorization to operate through the formal CBP Immigration Automated Clearance System process. AMO has a plan of action and milestones (POA&M) that includes the completed privacy threshold analysis for ISR Systems and its System Privacy Plan. The POA&M includes timeframes for obtaining authorization for operating ISR Systems.

OFFICE	AUDIT	RECOMMENDATION	STATUS
AMO	OIG-18-79	Create and implement a process according to DHS policy for timely installing software patches on the VADER [Vehicle and Dismount Exploitation Radar] and Minotaur systems.	AMO has created a process for timely, 90-day installation of software patches on the VADER and Minotaur systems. To maintain Department of Defense and CBP integrity and current efficiencies, AMO has prepared a request to CBP OIT for approval to implement a timely software patch cycle of 90 days for Minotaur and VADER.
AMO	OIG-18-79	Create and implement a process to update all ISR System subsystems currently running on unsupported operating systems.	AMO has created and implemented a process to update all ISR Systems subsystems currently running on unsupported operating systems. The transition from unsupported legacy software to the supported Minotaur system is programmed to occur.
OFO	OIG-18-80	CBP Executive Assistant Commissioner, Office of Field Operations, take steps to coordinate with airport and airline stakeholders to increase bandwidth to meet the operational demands of biometric processing at the Nation's top airports.	Because CBP is approaching biometric entry-exit implementation in partnership with airline/airport operators' network connectivity is a key topic with regard to implementing the program. Although CBP is not selecting specific hardware or bandwidth requirements, connectivity information is included in Section 2 of the Traveler Verification Service Technical Reference Guide. Given that airports and airlines are beginning to include the use of biometrics in their own business processes (e.g., aircraft boarding), it is in their own interests to ensure adequate connectivity so that they can meet the complex operational demands to ensure timely aircraft departures.
OFO	OIG-18-80	CBP Executive Assistant Commissioner, Office of Field Operations, develop an internal plan to institute enforcement mechanisms or back-up procedures to prevent airlines from bypassing biometric processing prior to flight boarding.	As the biometric air exit capability nears full operational capability, CBP will develop a plan to institute photo capture enforcement mechanisms in partnership with airport and airlines stakeholders. The plan will include operating parameters, SOPs, and an enforcement ramp-up period to allow travelers, airlines, and airports

OFFICE	AUDIT	RECOMMENDATION	STATUS
			adequate time to adjust operations and ensure compliance with biometric air exit.
OFO	OIG-18-80	CBP Executive Assistant Commissioner, Office of Field Operations, continue to refine the Traveler Verification Service algorithm to ensure the highest possible passenger match rate, with allowances for photo and age quality.	<p>CBP has instituted rigorous process to review data and metrics associated with biometric facial recognition matching performance. Since the completion of the OIG's field work in January 2018, and as of the end of July 2018, CBP has conducted departure operations on more than 3,300 flights with a total of 621,000 passengers; of those travelers' images that were captured at the gate and a photo in the gallery, 97 percent were matched successfully. As a result of CBP's continuous monitoring and incremental improvements to the matching algorithm, CBP data currently do not demonstrate any significant difference in match rate between citizenship, age, or gender. CBP's biometric matching service utilizes a number of tools to minimize and mitigate algorithmic performance including:</p> <ol style="list-style-type: none">1) Use of diverse training sets;2) Matching against a limited set of faces based on the flight, cruise, or border crossing;3) Continuous monitoring for performance; and4) Execution of a variety of statistical tests to bolster performance thresholds and minimize any matching discrepancies. <p>To ensure a high performance of the algorithm further, CBP has partnered with DHS Science and Technology and is currently in the process of partnering with the National Institute of Standards and Technology to perform an independent and comprehensive scientific analysis of CBP's operational</p>

OFFICE	AUDIT	RECOMMENDATION	STATUS
			<p>face matching performance, including impacts due to traveler demographics and image quality. CBP expects to begin this work no later than December 31, 2018.</p> <p>CBP will continue to monitor actively and refine the performance of the algorithm and associated operational processes in order to make incremental improvements and ensure the high accuracy of facial matching for all travelers, regardless of ethnicity, age, or gender.</p>
OFO	OIG-18-80	CBP Executive Assistant Commissioner, Office of Field Operations, develop internal contingency plans for funding and staffing the program, in the event that airlines do not agree to partner with CBP in implementing the biometric capability nationwide.	<p>The OIG's draft report indicates that collaboration with the private sector is a significant point of failure for the biometrics program; however, CBP believes otherwise. Specifically, CBP's viewpoint is that not collaborating with the private sector is a far greater risk, as evidenced by the lack of biometric exit progress between 2004 and 2014, and further demonstrated by airlines'/ airports' comments and concerns expressed during the 2008 Notice of Proposed Rule Making process, which put the burden of biometric exit squarely onto air carriers. CBP's partnership approach allows CBP to build and maintain a robust traveler identity service ecosystem that enables airports and airlines to approach the biometric exit mandate within their own modernization plans and in a way that meets individual operational nuances. The alternative is a government wholly owned solution that could add layers to an already complex travel environment with limited regard to traveler experience and individual airline/airport facility and operational realities. Since the OIG completed its fieldwork in January 2018, CBP has</p>

OFFICE	AUDIT	RECOMMENDATION	STATUS
			<p>received eight letters from different airports and airlines committing to implement biometric exit in collaboration with CBP.</p> <p>CBP recognizes that a collaborative approach with the private sector is new, does not necessarily fit into current government acquisition and project management processes, and may present a certain uneasiness with oversight authorities with regard to project schedule and funding. Although CBP is confident that a partnership is the right approach for implementation of biometric exit, CBP will develop an internal contingency plan for funding and staffing the program in case airlines and airports do not partner with CBP.</p>
OFO	OIG-18-83	The Executive Assistant Commissioners for Office of Field Operations and Operations Support conduct an analysis to determine what additional staff, canines, x-ray scanning machines, and hand-held chemical analysis devices are needed to adequately address the threat from opioids arriving daily in the large volume of international mail.	<p>OFO will collaborate with OS to conduct a cost-benefit analysis. The cost-benefit analysis will evaluate and determine additional staffing levels, canine teams, and technology that is necessary to address efficiently and adequately the threat. (b) (7)(E)</p> <p>(b) (7)(E)</p> <p>(b) (7)(E) It is important to note that significant equipment upgrades already have been made at the (b) (7)(E) (b) (7)(E) since the OIG's July 2017 audit team visit. For example, as of November 7, 2017, the (b) (7)(E)</p> <p>(b) (7)(E)</p> <p>(b) (7)(E) A permanent narcotics detection and analysis laboratory to replace the temporary</p>

OFFICE	AUDIT	RECOMMENDATION	STATUS
			laboratory is in the planning stage for the facility.
OFO	OIG-18-83	The Executive Assistant Commissioners for Field Operations and Operations Support assign and dedicate canine teams as appropriate to detect opioids at the international mail facility on a daily basis.	The OFO (b) (7)(E) (b) (7)(E) will work with the OFO Operations Directorate (OPS) to evaluate an increase in the total number of canine narcotic detector teams assigned at the (b) (7)(E) (b) (7)(E). As an interim solution, the (b) (7)(E) and OPS will explore alternatives to commercial kenneling, as a means of enhancing the port's ability to deploy more rapidly available canine teams to address immediate threats of illicit opioids in international mail.
OFO	OIG-18-83	The Assistant Commissioner for the Office of Information and Technology (OIT) and Executive Assistant Commissioners for Field Operations and Operations Support jointly establish a process to inventory arriving international air mail received from USPS, scanned by CBP, and returned to USPS.	OFO, Manifest and Conveyance Security Division, in collaboration with the NII Division, already has identified the need for (b) (7)(E) NII equipment with the capacity to address the specific inventory issue as described in the recommendation, as well as (b) (7)(E). The procurement and acquisition process currently is being developed internally.
OFO	OIG-18-83	The Executive Assistant Commissioners for Field Operations and Operations Support update CBP's International Mail Operations and Enforcement Handbook to reflect all types of arriving international mail.	OFO will revise CBP's International Mail Operations and Enforcement Handbook to reflect more fully the current operational conditions in relation to (b) (7)(E) of international mail arriving, increasing volumes of international mail, and the applicability of advance electronic data to (b) (7)(E) inbound international mail.
OFO	OIG-18-83	The Executive Assistant Commissioners for Field Operations and Operations Support perform and document periodic 'Mail Flex' operations, including use of canine teams, to better determine the size and scope of the threat inherent in specific	The OFO (b) (7)(E) is collaborating with OFO's National Targeting Center-Cargo, OPS, HSI, U.S. Postal Inspection Services, and state and local law enforcement agencies, to develop and implement (b) (7)(E).

OFFICE	AUDIT	RECOMMENDATION	STATUS
		classes of mail and form specific countries.	(b) (7)(E) through the (b) (7)(E) (b) (7)(E)
OFO	OIG-18-83	The Assistant Commissioner for the OIT and the Executive Assistant Commissioners for Field Operations Support jointly establish adequate internal control processes, including maintaining inventories and physically securing suspicious mail that may be seized following additional review.	OFO, (b) (7)(E) in collaboration with Enterprise Services - OIT will develop and deploy an automated technical solution for maintaining an accurate inventory on those segregated international mail items that are subject for further scrutiny, but not yet seized. CBP (b) (7)(E) (b) (7)(E) to ensure (b) (7)(E) (b) (7)(E) parcels prior to seizure. Parcels (b) (7)(E) (b) (7)(E) but not yet seized, are secured immediately upon initial examination in (b) (7)(E) and is equipped with (b) (7)(E) (b) (7)(E) Only personnel assigned to work in the secure space are granted access card privileges.
OFO	OIG-18-83	The Executive Assistant Commissioners for Field Operations and Operations Support jointly update the Seized Asset Management and Enforcement Procedure Handbook and the International Mail Operations and Enforcement Handbook to outline all of the precautions necessary to safeguard suspicious mail prior to formal seizure.	In 19 U.S.C. 1499 § (c)(1), CBP is provided a 5-day period (excluding weekends and holidays) following the date on which merchandise is presented for customs examination, to make informed determinations regarding merchandise releases or detentions. This 5-day period is prior to formal seizure. The Seized Asset Management and Enforcement Procedure Handbook (SAMEPH) references 19 U.S.C. 1499 § (c)(1). OFO will revise the International Mail Operations and Enforcement Handbook to reflect more fully the appropriate operational processes in international mail to account for safeguarding of mail held by CBP prior to formal seizure. The SAMEPH also will be updated to reference the International Mail Operations and Enforcement Handbook for proper

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OFFICE	AUDIT	RECOMMENDATION	STATUS
			procedures governing the handling of these mail items prior to seizure.
ES-OIT	OIG-18-83	The Assistant Commissioner for OIT update CBP's targeting servers with DHS-recommended system configuration management settings or request waivers, as appropriate.	<p>OIT will update CBP's targeting servers with updated Configuration Management (CM) settings developed and defined through implementation of the CBP Enterprise Security Program. Upon completion, OIT will reference any waivers as needed to ensure either the CM settings fully comply with DHS-recommended system settings, or are documented via waivers or other methods.</p> <p>OIT completed documenting the difference between CBP and DHS Security Technical Implementation Plan for Windows 16 via compliance scans conducted by CBP/OIT Security Operations Division.</p>
ES-OIT	OIG-18-83	The Assistant Commissioner for OIT develop a plan with milestones for replacing the noncompliant CCTV system with an inventoried and compliant system.	<p>CBP will develop and implement a plan with milestones for replacing the noncompliant CCTV system with an inventoried and compliant system.</p> <p>OIT installed two new CISCO switches and configured the VLAN for Centralized Area Video Surveillance System (CAVSS) Project on September 21, 2018. The CAVSS installation is complete.</p>

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Homeland
Security

Privacy Office, Mail Stop 0655

October 2, 2019

SENT VIA E-MAIL TO: foia@americanoversight.org

Austin R. Evers
Executive Director
American Oversight
1030 15th Street, NW
Suite B255
Washington, DC 20005

Re: **19-cv-10916**
American Civil Liberties Union of Massachusetts et al. v. DHS
Supplemental Release for DHS FOIA Request No. 2019-HQLI-00020

Dear Mr. Evers:

This is a supplemental response to your Freedom of Information Act (FOIA) request to the Department of Homeland Security (DHS), received on March 11, 2019. After further consultation with U.S. Customs and Border Protection (CBP) regarding an 86-page document titled "Fiscal Year 2018 Border Security Improvement Plan," additional information is being released in three instances. Portions of the document continue to be withheld pursuant to FOIA Exemption (7)(E), 5 U.S.C. §552 (b)(7)(E).

Sincerely,

A handwritten signature in black ink that reads "Bradley E. White".

Bradley E. White
Senior Director, FOIA Appeals and Litigation

Enclosed: 86 pages

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Fiscal Year 2018 Border Security Improvement Plan

December 21, 2018

Fiscal Year 2018 Report to Congress



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Message from the Secretary

December 21, 2018

I am pleased to submit the following report, "Fiscal Year 2018 Border Security Improvement Plan," which has been prepared by U.S. Customs and Border Protection (CBP).

This report was compiled pursuant to the legislative language set forth in the Fiscal Year (FY) 2018 Department of Homeland Security (DHS) Appropriations Act (P.L. 115-141) and its accompanying Joint Explanatory Statement. The report provides a risk-based plan for improving security along the borders of the United States, including the use of personnel, fencing, other forms of tactical infrastructure, and technology.



Pursuant to congressional requirements, this report is being provided to the following Members of Congress:

The Honorable Kevin Yoder
Chairman, House Appropriations Subcommittee on Homeland Security

The Honorable Lucille Roybal-Allard
Ranking Member, House Appropriations Subcommittee on Homeland Security

The Honorable Shelley Moore Capito
Chairman, Senate Appropriations Subcommittee on Homeland Security

The Honorable Jon Tester
Ranking Member, Senate Appropriations Subcommittee on Homeland Security

I would be pleased to respond to any questions you may have. Please do not hesitate to contact my office at (b)(6)

Sincerely,

(b)(6)

Kirstjen M. Nielsen
Secretary
U.S. Department of Homeland Security

Executive Summary

The 2018 Border Security Improvement Plan (BSIP) was developed pursuant to the language set forth in the FY 2018 DHS Appropriations Act (P.L. 115-141) and its accompanying Joint Explanatory Statement, which require the Secretary of Homeland Security to “submit to the Committees on Appropriations of the Senate and the House of Representatives a risk-based plan for improving security along the borders of the United States, including the use of personnel, fencing, other forms of tactical infrastructure, and technology.”

The 2018 BSIP builds upon the framework established in the 2017 BSIP. The 2017 BSIP was developed by CBP and signed by Secretary Kirstjen M. Nielsen on January 4, 2018. It was created pursuant to the legislative language set forth in the FY 2017 DHS Appropriations Act (P.L. 115-31). The 2017 BSIP created a framework for CBP to analyze and prioritize initiatives to improve border security. This framework is based on three fundamental goals and their associated objectives:

Goal 1: Enhance understanding of border threats and risks	Goal 2: Strengthen enforcement operations at the border	Goal 3: Lead a resilient network of border enforcement capabilities
<ul style="list-style-type: none">• Objective 1: Increase situational awareness• Objective 2: Advance risk management in decision making• Objective 3: Identify and counter criminal and terrorist organizations and networks	<ul style="list-style-type: none">• Objective 1: Expand operational readiness• Objective 2: Enhance impedance and denial of illegal border crossings• Objective 3: Ensure agility for appropriate and timely law enforcement responses	<ul style="list-style-type: none">• Objective 1: Expand information and intelligence sharing partnerships• Objective 2: Increase ability to address border security risks as early as possible• Objective 3: Strengthen coordinated border enforcement globally

Ultimately, security of our national borders is a national security issue that is among the most vital elements of the Nation’s economic and physical well-being. CBP is the leading law enforcement agency responsible for border security. CBP recognizes that actions taken pursuant to the 2017 BSIP and other border security-related plans have an impact on the effectiveness of the tactics, techniques, and procedures used by our adversaries in attacking our borders. Thus, CBP will use the framework established in the 2017 BSIP to enhance continuously its approach to border security, addressing the constantly evolving threats and challenges of the border environment.

CBP's comprehensive and agile approach to delivering the highest level of border security is built around the three foundational elements of border security:

- Knowing what is happening in the border environment,
- Having the ability to act or respond to that knowledge, and
- Cultivating partnerships that enhance knowledge and the ability to act.

CBP will use these foundational elements, analysis of the ever-changing information on the border threat landscape, and a framework of goals and objectives to refine and optimize continuously its investment strategies.



Fiscal Year 2018 Border Security Improvement Plan

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I. Legislative Language

This document was compiled pursuant to legislative language set forth in the Fiscal Year (FY) 2018 Department of Homeland Security (DHS) Appropriations Act (P.L. 115-141) and its accompanying Joint Explanatory Statement.

P.L. 115-141 states:

SEC. 231. (a) Not later than 180 days after the date of the enactment of this Act, the Secretary shall submit to the Committees on Appropriations of the Senate and the House of Representatives a risk-based plan for improving security along the borders of the United States, including the use of personnel, fencing, other forms of tactical infrastructure, and technology, to include—

- (1) A statement of goals, objectives, activities, and milestones for the plan.
- (2) A detailed implementation schedule for the plan with estimates for the planned obligation of funds for fiscal years 2019 through 2027 that are linked to the milestone-based delivery of specific—
 - (A) capabilities and services;
 - (B) mission benefits and outcomes;
 - (C) program management capabilities; and
 - (D) lifecycle cost estimates.
- (3) A description of the manner in which specific projects under the plan will enhance border security goals and objectives and address the highest priority border security needs.
- (4) An identification of the planned locations, quantities, and types of resources, such as fencing, other physical barriers, or other tactical infrastructure and technology, under the plan.
- (5) A description of the methodology and analyses used to select specific resources for deployment to particular locations under the plan that includes—
 - (A) analyses of alternatives, including comparative costs and benefits;
 - (B) an assessment of effects on communities and property owners near areas of infrastructure deployment; and
 - (C) a description of other factors critical to the decision making process.
- (6) An identification of staffing requirements under the plan, including full-time equivalents, contractors, and detailed personnel, by activity.
- (7) A description of performance metrics for the plan for assessing and reporting on the contributions of border security capabilities realized from current and future investments.
- (8) A description of the status of the actions of the Department of Homeland Security to address open recommendations by the Office of Inspector General and the Government Accountability Office relating to border security, including

plans, schedules, and associated milestones for fully addressing such recommendations.

(9) A plan to consult State and local elected officials on the eminent domain and construction process relating to physical barriers;

(10) An analysis, following consultation with the Secretary of the Interior and the Administrator of the Environmental Protection Agency, of the environmental impacts, including on H. R. 1625—271 wildlife, of the construction and placement of physical barriers planned along the Southwest border, including in the Santa Ana National Wildlife Refuge; and

(11) Certifications by the Under Secretary of Homeland Security for Management, that—

(A) the plan has been reviewed and approved in accordance with an acquisition review management process that complies with capital planning and investment control and review requirements established by the Office of Management and Budget, including as provided in Circular A-11, part 7; and

(B) all activities under the plan comply with Federal acquisition rules, requirements, guidelines, and practices.

(b) The Secretary shall concurrently submit the plan required in subsection (a) to the Comptroller General of the United States, who shall evaluate the plan and report to the Committees on Appropriations of the Senate and the House of Representatives on the strengths and weaknesses of such plan not later than 120 days after receiving such plan.

The Joint Explanatory Statement includes the following:

Sec. 231. A new provision is included requiring the Secretary to submit a risk-based plan for improving security along the borders of the United States.

For Official Use Only (FOUO) Classification

Pursuant to DHS Management Directive 11042.1, Safeguarding Sensitive but Unclassified (For Official Use Only) Information, this report in its entirety is classified FOUO because it aligns with exemption (a): “Information of the type that may be exempt from disclosure per 5 U.S.C. § 552, Freedom of Information Act, and its amendments” and exemption (b): “Information exempt from disclosure per 5 U.S.C. § 552a, Privacy Act” of the Directive.

II. Background

A. Border Security

Securing America's borders is an essential element to promoting economic prosperity and physical security for our citizens. Our borders present unique challenges because the border is a complex environment with a diverse array of constantly and rapidly evolving threats. Some of these threats and challenges include terrorism, transnational crime, illegal immigration, counterfeit and unsafe goods, agricultural pests and diseases, narcotics smuggling, human trafficking, and the outbound transfer of prohibited weapons and illicit bulk currency.

Security of our Nation's borders is a critical mission for DHS, and it is a mission based on three foundational elements:

- Knowing what is happening in the border environment,
- Having the ability to act or respond to that knowledge, and
- Cultivating partnerships that enhance knowledge and the ability to act.

These three elements form the foundation of all strategies and activities across the Department's Border Security Enterprise. Increasing our capabilities and capacity in these three areas improves DHS's security posture along our borders.

1. DHS Border Security Enterprise

DHS leads a broad network of border security capabilities across the Federal Government and beyond. Security of our borders cannot be managed as a finite perimeter, but must include a system of layers of security that start beyond our borders and extend to the interior of the United States. The array of border security capabilities employed by DHS and our federal, state, local, tribal, and international partners enables a holistic approach to preventing the illegal entry of people, drugs, and goods across the Southern Border, Northern Border, and the maritime approaches to our shores.

The following are some of the major capabilities and activities employed by DHS in its layered approach to border security:

International Engagement: Effective border security begins in source and transit countries. Substantial, sustained success requires cooperation with federal partners, foreign governments, and other international partners to prevent illegal pathways and networks that fuel violence and corruption. Building cooperative and mutually beneficial security relationships also will facilitate the legitimate flow of people and goods. Working with the U.S. Department of State (DOS)—which leads U.S. international engagement—DHS supports U.S. efforts to promote

source country economic development and political stability, to negotiate agreements to achieve joint policy goals, and to issue visas for eligible applicants who seek a lawful pathway for entry into the United States, among other activities. This international engagement includes law enforcement capacity development in both source and transit countries.

Throughout the world, and particularly in the Western Hemisphere, DHS implements:

- training courses;
- capacity-building programs;
- information-sharing activities;
- joint operations with partners in law enforcement, aviation security, customs regulation, border enforcement, cybersecurity, and countering violent extremism; and
- humanitarian support related to mass migrations, trafficking in persons, and emergency response.

Additionally, DOS and DHS jointly strive to negotiate removal agreements, necessary for the repatriation of aliens subject to final removal orders, from both willing and recalcitrant source countries. In fact, DOS has granted DHS authority to enter into agreements with other nations as the Department seeks improved operational integration and coordinated interdiction of illicit drug smuggling and other illegal activities.

Transnational Criminal Organization (TCO) Dismantlement: Reducing transnational organized crime and associated illegal activities are key elements of the plan to improve border security. TCOs vary widely in their size and nature; ranging from large, diversified cartels, such as the Sinaloa Cartel, to small, specialized organizations focused on a specific area or function. Specific types of TCOs include drug trafficking organizations (DTO) and alien smuggling organizations (ASO). DTOs are typically large, complex organizations with highly defined command and control structures that produce, transport, and distribute large quantities of one or more drugs. ASOs, in contrast, are typically smaller organizations that operate separately or independently from, but under the jurisdiction of, larger TCOs controlling specific territories.

Countering these TCOs is a national security priority for the Administration, and a major focus of DHS's efforts to improve border security. Working with its partners, (b)(7)(E)

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Border Enforcement: DHS apprehends or arrests potentially removable aliens, criminals, and suspected terrorists and interdicts dangerous and illicit goods while facilitating lawful trade and travel. The Southern Border and approaches and the Northern Border are vast and encompass diverse geographic regions cutting across domains, jurisdictions, international boundaries, and enforcement activities. Given this complex environment, direct enforcement of U.S. laws is

challenging and requires cooperation from a wide range of federal agencies and international partners, as well as support from state and local law enforcement partners. Law enforcement activities within the Southern Border and approaches and the Northern Border are the foundation of border security and represent the largest investment of DHS resources. U.S. Customs and Border Protection (CBP), U.S. Coast Guard, and U.S. Immigration and Customs Enforcement (ICE) are the primary law enforcement agencies responsible for border enforcement.

Consequence Delivery System: Under Section 8 of the U.S. Code, it remains a crime to enter into the United States at a location other than a designated port of entry (POE). Border security requires imposing consequences on illegal border crossers, traffickers, and smugglers, along with timely adjudication of applications for relief. (b)(7)(E)

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In addition to imposing administrative consequences (removal), criminal consequences such as federal prosecution are also necessary to deter repeat offenders from continued illegal entry attempts. Apprehended illegal aliens may apply for lawful immigration benefits (asylum or other forms of relief, including protection from removal), but these applications must be adjudicated thoroughly to ensure that benefits are granted only to those who meet legal eligibility standards, while preventing the exploitation of immigration benefits by those who seek entry through fraud and deception.

Working with its partners, DHS imposes a range of consequences on aliens arrested for attempting illegal entry across our borders. The systematic delivery of consequences is most developed in the land domain between POEs through the U.S. Border Patrol (USBP) Consequence Delivery System. Although these consequences involve border apprehensions by DHS, the application of these consequences relies both on DHS and Federal Government partners at the U.S. Department of Justice, including the Executive Office for U.S. Attorneys, the U.S. Marshals Service, the Executive Office for Immigration Review, and the Federal Bureau of Prisons.

Interior Enforcement: Resilient border security also relies heavily on DHS's ability to enforce immigration laws within the interior of the United States. Effective interior enforcement must eliminate the expected benefit of illegally entering, or illegally remaining longer than permitted, in the United States, which, in turn, will deter other aliens from attempting to enter the United States illegally or from overstaying their authorized period of stay. The motivation of these illegal aliens varies and include higher wages, family reunification, quality of life, and criminal gain. Furthermore, some illegal aliens are able to illegally gain employment without verification of employment eligibility by employers, or by presenting fraudulent documents to employers who comply with the Immigration and Nationality Act requirements.

ICE is the primary law enforcement agency engaged in a wide range of interior enforcement activities to counter and deter illegal immigration to the United States. ICE identifies, arrests,

detains, and removes, from the interior, aliens who either overstayed or entered the country illegally. Specific activities include worksite enforcement; identification and removal of incarcerated criminal aliens; criminal and gang investigations; and partnerships with state and local law enforcement through programs such as 287(g) and Secure Communities. Holding employers accountable for employment eligibility verification is another important, effective element of reducing the incentive to cross our borders illegally.

This document will focus on the efforts of CBP, within this broader context, to enforce the Nation's laws and regulations and to ensure secure control of our Nation's borders, both between and at the POEs.

2. U.S. Customs and Border Protection

CBP is the leading law enforcement agency responsible for border security. In this role, CBP manages approximately 6,000 miles of land border and 95,000 miles of shoreline, while also preventing the illegal movement of people and contraband crossing into U.S. airspace. CBP is also responsible for managing the flow of lawful trade and travel through 328 air, land, and maritime POEs.

CBP Mission Statement

To safeguard America's borders thereby protecting the public from dangerous people and materials while enhancing the Nation's global economic competitiveness by enabling legitimate trade and travel.

CBP Vision Statement

To serve as the premier law enforcement agency enhancing the Nation's safety, security, and prosperity through collaboration, innovation, and integration.

Border security is one of CBP's primary missions and is a priority of the highest order. CBP's experience has shown that effective border security must employ an optimized resource allocation strategy that leverages the capabilities of multiple tools, material resources, and people. CBP constantly seeks to enhance its ability to address the three foundational elements of achieving border security: knowledge of the border environment; ability to act on that knowledge; and partnerships that increase knowledge or strengthen action.

CBP increases its knowledge of the border environment through several means, including, but not limited to: information sharing with law enforcement partners, use of advance information to

identify high-risk passengers and cargo, observation by personnel in border regions, sensor technology, infrastructure, tactical/strategic communications, and intelligence.

Personnel are the primary resource needed to secure our borders, but the ability to respond effectively can be improved through other resources such as: timely, actionable, and relevant intelligence; targeting and analytical systems; biometric identification technology; wall and other physical barriers; border access roads; sensor technology; aircraft, boats, and various types of vehicles; and modern tactical communications infrastructure. Impedance and denial barriers, such as walls and other tactical infrastructure, are essential components of CBP's tactical response along the border; such barriers simultaneously block illegal entry into the United States while also channeling those who would attempt illegal entry into areas where agents can apprehend, detain, and remove them more easily.

Although walls and other tactical infrastructure are the cornerstone of an effective border security strategy, (b)(7)(E) provide agents with additional critical knowledge of the movement of illegal persons and goods. (b)(7)(E)

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A personnel-only approach to border security is generally cost-prohibitive when compared with more thorough, integrated designs that augment personnel with infrastructure, technology, and other resources. That said, the hiring of additional Border Patrol Agents (BPA) to support response and resolution remains a critical capability for CBP. Likewise, an approach that is overly reliant on technology dramatically reduces the ability of agents to impede and interdict the entrance of illegal border crossers into the United States effectively. (b)(7)(E)

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In all, then, it is only through the effective utilization of a border security system comprising physical barriers, increased personnel, improved infrastructure, and cutting-edge technology that border security can be realized.

3. Border Security Challenges and Opportunities

The constantly evolving and shifting threats and challenges in the border environment require CBP to maintain a level of adaptability that allows the agency to employ the correct mix of tools, resources, and techniques to secure our borders effectively. CBP's experience has shown that actions taken along the border invariably will generate a reaction from those looking for gaps and seams in our security. (b)(7)(E)

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This action-reaction effect will continue to occur, driving changes to the operating environment. Additionally, new threats and challenges will appear when technological advances, geopolitical changes, economic crises, and other factors affect the international community.

A combination of infrastructure, legislative, and partnership solutions are required to address these dynamic challenges. First, continued investment in a border wall system is essential as it provides agents with the ability to impede and/or deny attempted illegal entries while creating additional time to carry out a law enforcement resolution. (b)(7)(E)

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The construction of both new and replacement wall system that incorporates complementary technology and roads is a critical component of USBP's pursuit of operational control of the Southwest Border (SWB).

In addition, CBP remains committed to working with U.S. government partner agencies as well as with the governments of Mexico, Honduras, Guatemala, and El Salvador in identifying and addressing the "pull" factors that encourage people from these countries to enter the United States illegally. While the opportunity to improve their lives is certainly a draw, legal loopholes like those found in the *Flores Settlement Agreement* also encourage individuals to make the dangerous trek from Central America and Mexico into the United States. As such, CBP welcomes the opportunity to work with Congressional leadership to develop legislative fixes to enable the modernization of the Nation's immigration system.

Operational Control

On January 25, 2017, the President issued Executive Order 13767, *Border Security and Immigration Enforcement Improvements*, directing DHS to take steps to achieve complete operational control (OPCON) of the Southern Border. It requires CBP to have effective capabilities to predict, detect, identify, classify, track, respond, and resolve illegal border crossings. To meet these requirements, CBP deploys air, land, and marine assets to patrol and secure U.S. border areas. Executive Order 13767 also set as policy that a physical barrier shall be constructed on the Southern Border, infrastructure that has proven to have a profound positive impact on operational control of the border. Therefore, CBP is pursuing investments in border walls, barriers, and sophisticated detection and intervention systems that enable CBP to reduce the use of terrain for illegal cross-border activity. These assets and systems also allow CBP to develop and sustain situational awareness of threats and associated risks, which is enhanced further by information and intelligence-sharing partnerships. CBP's approach is designed to be nimble, threat-based, and intelligence-driven, allowing threats to be identified as early as possible, responses to be targeted, and resources to be deployed optimally in response to those threats and to counter illegal actions in the border environment.

DHS is developing an OPCON strategy, which will describe CBP's current OPCON of the border and how CBP will achieve full OPCON in support of Executive Order 13767.

Impact of Impedance and Denial

CBP explains some of these historical examples in Section IV: Evolving and Maturing Border Investment Strategy and Appendix B: Impedance & Denial Report in the 2017 Border Security Improvement Plan (BSIP). Section IV notes that “from about 2002 to 2008, the USBP doubled in size and investments were made in more than 600 miles of new physical barriers ... as a result of investment in physical barriers, the highest risk areas were covered with barriers tailored to meet the needs of those areas as understood at the time.”¹ This section notes that this initial investment in barriers and infrastructure was predominantly from El Paso to the West, which was the highest risk region at the time. It also notes that there was (b)(7)(E)

(b)(7)(E) which is now “CBP’s area of highest activity, and is therefore a priority focus area for current investment strategies.”² Appendix B from the 2017 BSIP confirms that the deployment of Impedance & Denial capabilities along the Southern Border forced some threats to “shift from areas where border walls are deployed to target areas with limited or no border walls.”³

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Figure 1: Border barrier deployment 2002-2008

Although CBP’s investment strategies are tailored to the current understanding of the threat, they “also recognize that our adversaries will seek to find ways to breach the border over, under, through, or around a wall.”⁴ Thus, CBP takes a proactive posture in its planning and future-year

¹ 2017 BSIP, Section IV, p. 21

² BSIP, Section IV, p. 22

³ BSIP, Appendix B: Impedance & Denial Report, p. 119

⁴ BSIP, Section IV, p. 23

resource decisions to anticipate changes in border threats based on any actions that CBP currently is taking along the border. For example, the type of barriers depicted in Figure 1 includes “legacy” fencing (shown as purple, light blue, or pink) or vehicle barrier (shown as orange). These types of barriers are not as capable or effective as modern pedestrian walls. Therefore, CBP’s investment strategy contemplates replacements or upgrades in these areas, as dictated by the evolving threat.

CBP investments in technology, border wall, and law enforcement personnel have been successful in increasing border security and contributing to OPGON of the border. Arizona serves as a good example. Prior to the investments of the past decade, the (b)(7)(E)

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CBP’s investment strategy anticipates that while a border wall impedes the progress of illegal entries, it also recognizes that our adversaries will try to find alternative, more challenging and less advantageous methods to breach the border, despite the increased presence of walls and other barriers. CBP will (b)(7)(E)

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Consistent, informed situational awareness coupled with appropriate addition or enhancement of border roads for access and mobility enable USBP to respond appropriately to any breach or other illegal cross-border activity, including (b)(7)(E) As

CBP tightens the security posture between the POEs, it anticipates (b)(7)(E)

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Opioids, Narcotics, and Illegal Drugs

The growing epidemic of opioid misuse and abuse, combined with the prevalence of illicit opioids in the United States, is wreaking havoc in communities across the country. Drug overdoses are now the leading cause of accidental death in America. Almost one-third of these overdose deaths involved a synthetic opioid other than methadone, such as fentanyl and its analogues.⁵

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⁵ Provisional Counts of Drug Overdose Deaths, The Centers for Disease Control and Prevention’s National Center for Health Statistics, as of 8/6/2017. *Note: Provisional overdose death counts for 2016-2017 are based on data available for analysis as of the date specified. Provisional counts may be incomplete, and causes of death may be pending investigation.*

heroin in the United States because of the increasing cultivation of poppies, as well as geographic proximity. Meanwhile, most of the illicit fentanyl, which is a very dangerous synthetic opioid, is coming into the United States after production in clandestine labs in China.

As noted in Figure 2 below, the CBP Office of Field Operations (OFO)

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OFO Fentanyl Seizures (Kgs) by Mode					
Mode of Transport	FY 2016		FY 2017		%Change (Kgs)
	Weigh (Kgs)	Total Incidents	Weigh (Kgs)	Total Incidents	
POV - Land	145.92	14	323.69	52	122%
Other - land	25.42	6	63.49	13	150%
Express Consignment	21.42	40	108.88	118	408%
Mail	15.33	51	42.93	227	180%
Air (Other)	0.15	5	0.38	2	153%
TOTAL	208.25	116	539.38	412	159%

Figure 2: CBP Fentanyl Seizures⁶

CBP's efforts to combat this epidemic follow a multi-tiered approach that leverages partnerships, shared information, and resources to disrupt the supply chain and reduce the proliferation of these dangerous drugs.

Northern Border

In 2017, DHS conducted an assessment of Northern Border security and concluded that, although the Northern Border remains an area of limited threat in comparison to the Southern Border, safeguarding and securing the Northern Border presents unique challenges.⁷ The movement of illicit drugs as well as TCO activity are the two most common threats along the U.S.-Canadian border.

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⁶ Note: USBP did not track fentanyl seizures until July 2016. From July 7, 2016 – September 30, 2016, USBP seized 104.54 pounds of fentanyl. From October 1, 2016 – June 30, 2017, USBP seized 76.05 pounds of fentanyl.

⁷ DHS Northern Border Threat Analysis Report

https://www.dhs.gov/sites/default/files/publications/17_0731_Public_Summary_NBSRA_0.pdf

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The United States and Canada have a shared history of economic and security interests that require DHS to collaborate with the Canadian government, as well as with other federal, state, local, and tribal (FSLT) partners, in addressing these threats. Given the strong ties between the United States and Canada, facilitating lawful trade and travel is also of utmost importance to this relationship.

The DHS Northern Border Strategy was issued on June 12, 2018. The Strategy outlines three goals for DHS's mission along the U.S.-Canadian border:

- Goal 1: Enhance Border Security Operations
- Goal 2: Facilitate and Safeguard Lawful Trade and Travel
- Goal 3: Promote Cross-border Resilience

The border security elements of the Northern Border Strategy are built on the three foundations of border security described earlier in this report: knowledge of the border environment, the ability to respond to that knowledge, and partnerships that expand knowledge or enhance response capabilities. The Northern Border Strategy is focused heavily on increasing DHS's access to timely and actionable information and intelligence. This involves significant partnerships with FSLT, and international partners ultimately to develop a common understanding of the threat environment.

DHS also is seeking to (b)(7)(E)

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(b)(7)(E) Finally, there are numerous law enforcement agencies with the ability to conduct security operations along the Northern Border. Integrating these capabilities through joint operations and task forces will strengthen DHS's ability to identify, interdict, investigate, and disrupt illicit cross-border activities.

The intent of the DHS Northern Border Strategy is to provide guidance and to direct actions that will improve DHS's ability to safeguard the Northern Border against terrorist and criminal threats, facilitate the flow of lawful cross-border trade and travel, and strengthen cross-border community resilience. The Strategy and its corresponding Implementation Plan will be used to identify gaps in DHS's Northern Border capabilities that can be addressed in order to achieve the Strategy's specified outcomes over 5 years, beginning in FY 2020.

⁸ DHS Northern Border Strategy, June 12, 2018, p. 11

Trade and Travel

CBP and ICE are unique federal law enforcement agencies because of their dual roles of securing U.S. borders while also facilitating international trade and travel. CBP seeks to intercept risks and potential threats at the earliest possible moment in the trade and travel process, beginning with a review of advance information. Prior to departure or entry, CBP uses a wide array of data sources, including advance information submitted by travelers and traders, to build risk assessments for travelers, cargo shipments, and supply chains. When advance targeting indicates that a person or shipment potentially may be high-risk, CBP can employ enforcement actions either prior to departure from the foreign port of origin or upon arrival at a particular POE. Enforcement actions by CBP then are coordinated with ICE for further investigation.

In addition, CBP partners with the business community to develop innovative approaches to cargo supply chain security. One approach that resulted from this collaboration is the Customs-Trade Partnership Against Terrorism (CTPAT). CTPAT is a voluntary, government-business initiative that protects the United States against acts of terrorism. This is achieved by improving the security of cargo entering and exiting the United States through rigorous security reviews of international supply chains and onsite visits of foreign suppliers that load and transport U.S. cargo. It began with seven importer companies, and since has expanded to include more than 11,000 companies from nearly every entity type to transport cargo in and out of the United States.

CBP must balance its security mission with its mission to facilitate lawful trade and travel. Facilitating trade protects the Nation's economy, promotes job growth, and helps the U.S. private sector to remain competitive. Facilitating trade and travel uses many of the same tools and techniques as securing trade and travel, both of which rely heavily upon getting information as early as possible. Cultivating relationships with the private sector and collaborating with other DHS components, and federal agencies and departments—such as the U.S. Coast Guard, ICE, U.S. Department of Health and Human Services (HHS), Consumer Product Safety Commission, and U.S. Department of Agriculture—and with foreign governments, increases the information available to CBP for making intelligence-driven, risk-based decisions. Increased and improved information allows CBP to identify low-risk passengers better and shipments faster and more accurately, expanding their efficient movement better through the import or travel process. Meanwhile, it also identifies the portion of the travelling public and American supply chain that genuinely poses a threat to U.S. national and economic security.

4. Border Security Improvement Plan

This document has been prepared to respond to the requirements specified in legislative language, as follows:

- Section III provides the goals, objectives, and activities as required by subparagraph (1) of the legislative language.
- Read in concert with the 2017 BSIP, Section IV identifies specific border security initiatives and investments in response to subparagraphs (2) through (4) and subparagraph (6) of the legislative language.
- Section V describes the performance metrics used to assess and report on the contributions of border security capabilities realized from current and future investments, as required by subparagraph (7) of the legislative language.
- Section VI addresses consultation requirements and environmental impacts of planned physical barriers along the southwest border, as required by subparagraphs (9) and (10) of the legislative language.
- Section VII includes appendices, including a description of the status of open U.S. Government Accountability Office and Office of the Inspector General recommendations, as required by subparagraph (8) of the legislative language.

III. Border Security Improvement Goals and Objectives

The goals and objectives that follow were articulated originally in the 2017 BSIP. They build on CBP's Vision & Strategy 2020 and are consistent with strategic guidance from the White House and DHS. These goals and objectives create a framework for CBP to analyze and prioritize strategies and investments that will strengthen CBP's ability to achieve high levels of borders security.

A. Goal 1: Enhance understanding of border threats and risks

Objective 1: Increase situational awareness

Intended Outcome: Increase CBP's ability to *see* what is happening in the border environment, to *understand* what is seen, and to *predict* what is going to happen in the near future and to better prepare CBP for an appropriate law enforcement response.

Key Capabilities:

- Domain awareness
- Analysis
- Risk assessment
- Screening and scanning
- Vetting
- Information sharing and dissemination
- Command, control, & communications

Associated Activities, Technology, and Resources:

- Intelligence collection
- Intelligence analysis
- National Targeting Center (NTC)
- Air and Marine Operations Center
- Northern Border Coordination Center
- Threat prediction and classification
- Passenger and cargo targeting
- Supply chain security
- International engagement
- Ground sensors
- Imaging systems
- Biometrics
- Mobile surveillance

FY 2018 – 2020 Milestones:

- Establish a cohesive CBP Intelligence Enterprise to foster and maintain a cohesive understanding of the dynamic threat environment.
- Develop a CBP Intelligence Enterprise Doctrine to govern and outline how CBP collects, analyzes, and disseminates intelligence.
- Establish a repeatable and standardized process for developing CBP's Priority Intelligence Requirements.
- Improve capabilities to maintain and improve situational awareness that better enable CBP to gain and maintain OPCON.

- Identify and implement solutions to advance trade, analytical and system capabilities to enable intelligent and secure trade enforcement.

Objective 2: Advance risk management in decision-making

Intended Outcome: Promote CBP's risk-based approach that identifies and evaluates threats, enabling CBP to identify the appropriate mix of capabilities and resources to achieve the highest possible levels of border security in all border environments.

Key Capabilities:

- Domain awareness
- Analysis
- Planning
- Information sharing and dissemination

Associated Activities, Technology, and Resources:

- Enterprise risk management
- Data Analysis
- Intelligence collection and analysis
- Collaboration with partners
- Performance management
- Acquisition management
- Planning, programming, budget, and accountability business process
- Investment analysis and portfolio management

FY 2018 – 2020 Milestones:

- Maximize the use of information and intelligence to analyze risk, prioritize threats, and anticipate emerging trends.
- Enhance law enforcement operations that are risk-informed, intelligence-driven, and integrated with domestic and international partners.
- Advance the National Vetting Center (NVC) to support intelligence-driven decision making.
- Develop risk assessment tools to expand identification of individuals and entities that have a nexus to illicit financing and terrorism-related activities.

Objective 3: Identify and counter criminal and terrorist organizations and networks

Intended Outcome: Strengthen CBP's counter-network approach across all aspects of CBP's mission set to attack and disrupt criminal and terrorist networks

Key Capabilities:

- Domain awareness
- Analysis
- Risk assessment
- Vetting
- Screening and scanning
- Information sharing and dissemination

Associated Activities, Technology, and Resources:

- NVC
- Targeting
- Counter-network operations
- NTC
- Operational and tactical risk management
- Network and data analysis
- Intelligence collection and analysis
- Collaboration with federal, state, local, international, and private-sector partners
- Trade and travel intelligence
- Information sharing
- Joint operations
- Capacity building

FY 2018 – 2020 Milestones:

- Advance initiatives, programs, and systems to protect the Homeland from terrorists and their weapons.
- Engage partners to enhance vetting, address migration flows in the Western Hemisphere, and lead efforts to enhance screening and vetting capabilities that can serve the entire U.S. Government, including the development of a National Vetting Center.
- Emphasize collaborative counter network operations at the national, Joint Task Force-Investigations, and corridor level.
- Protect our Nation's economy by targeting evasive trade practices, intellectual property rights violators, and the use of forced labor in supply chains.
- Advance CBP's ability to identify travelers positively and efficiently through the use of biometric entry/exit solutions that simplify entry and enhance security.
- Advance the NVC to provide scalable, consistent, targeted, and person-centric vetting across international traveler and immigration populations.

B. Goal 2: Strengthen enforcement operations at the border

Objective 1: Expand operational readiness

Intended Outcome: Strengthen CBP's ability to apply trained personnel and required equipment at the right time to the entire range of the CBP mission.

Key Capabilities:

- Planning
- Mission support
- Domain awareness
- Resource management

Associated Activities, Technology, and Resources:

- Workforce and mission support modelling
- Capability gap analysis
- Operational and tactical risk management
- Requirement development
- Resource management, modeling, and optimization
- Performance management
- Business process optimization
- Automation

FY 2018 – 2020 Milestones:

- Deploy proven surveillance technologies while pursuing innovative enablers such as small unmanned aerial systems (UAS) to support operators in the field.
- Develop Hiring & Recruiting Strategies for frontline and non-frontline personnel.
- Hire law enforcement and mission support personnel to meet mission requirements and requirements of Executive Order 13767.
- Conduct threat assessments and prioritize operations to achieve OPCON in high-risk areas.
- Ensure appropriate number of auditors and other trade enforcement personnel to enable intelligent trade enforcement.
- Conduct risk-informed, intelligence-driven operational planning to inform border security strategy and maximize resources for detection, interdiction and investigation.

Objective 2: Enhance impedance and denial of illegal border crossings

Intended Outcome: Delay and prevent illegal border crossings through achieving high levels of OPCON in the land border environment between the ports and high levels of enforcement at the POEs.

Key Capabilities:

- Impedance
- Denial
- Consequence delivery
- Risk assessment
- Screening
- Scanning
- Adjudication

Associated activities, Technology, and Resources:

- Ongoing requirements development and refinement for border barrier and associated technology
- Construction of border barrier and deployment of border security technology
- Hire agents and officers
- Modernize systems and technology at and between POEs
- Trade enforcement
- Travel enforcement

FY 2018 – 2020 Milestones:

- Implement and baseline OPCODE across all USBP Sectors through informed application of agility and enhanced capabilities to impede or deny illegal border crossings and apply appropriate law enforcement responses.
- Develop improved processes to detect and interdict illicit opioids and other narcotics entering the country through International Mail Branches and Express Consignment Operations.
- Construct border wall and additional barriers as appropriate that are supported by technology and access roads in high-priority and high-threat locations.
- Implement a Third Country National Land Border Biometric Exit process to strengthen CBP's ability to identify passengers who overstayed their authorized period of admission.
- Establish full scalability for Traveler Verification Services for Biometric Exit with cloud infrastructure and matching capability to ensure the system is fully deployable and accessible at POEs.
- Implement a completely redeveloped Simplified Arrival primary application that fully integrates Facial Recognition into the entry process.

Objective 3: Ensure agility for appropriate and timely law enforcement responses

Intended Outcome: Strengthen mobile and rapid interdiction capabilities along with effective, modern tactical communications infrastructure to enable an appropriate and timely law enforcement response.

Key Capabilities:

- Command, control, & communications
- Interdiction
- Holding and processing
- Adjudication
- Surveillance

Associated Activities, Technology, and Resources:

- Land access
- Officer and agent safety
- Stage equipment and resources
- Hire law enforcement personnel
- Workforce modeling
- Modernize facilities, systems, and assets

FY 2018 – 2020 Milestones:

- Modernize aircraft, vessels, and domain awareness capabilities.
- Upgrade field technology assets, including mobile video surveillance systems, imaging equipment, and basic agent equipment, to support improved situational awareness, rapid response, and agent safety.
- Integrate outbound enforcement capabilities that coordinate verification of outbound travelers with U.S. law enforcement and intelligence communities for violations and support strengthened outbound enforcement.

C. Goal 3: Lead a resilient network of border enforcement capabilities

Objective 1: Expand information- and intelligence-sharing partnerships

Intended Outcome: Enable CBP to take a proactive enforcement posture and support effective border management.

Key Capabilities:

- Information sharing
- Intelligence
- International engagement
- Risk assessments

Associated Activities, Technology, and Resources:

- Joint Security Program
- Automated Targeting System-Global
- Risk management
- Intelligence and information sharing
- Intelligence and data analysis
- Integrated intelligence enterprise
- Collaboration and coordination with partners
- Develop a common platform to ensure timely access to intelligence information in a centralized repository
- Intelligence training

FY 2018 – 2020 Milestones:

- Advance CBP relationships with key partners to strengthen data-exchange efforts such as the Joint Security Program and Automated Targeting System-Global.
- Deploy short-term initiatives and develop capabilities for data sharing with domestic and foreign partners to improve vetting quality and address current information gaps.

Objective 2: Increase ability to address border security risks as early as possible

Intended Outcome: Stop threats effectively before they reach U.S. borders.

Key Capabilities:

- Information sharing
- Risk assessments
- Analysis
- International engagement

Associated Activities, Technology, and Resources:

- Coordinate internationally
- Joint operations
- Deploy CBP staff and assets overseas
- Intercept and deters illicit activity
- Coordinate resources with partners
- Coordinate with Canada and Mexico

FY 2018 – 2020 Milestones:

- Develop integrated approaches to current and evolving threats via collaboration with partners to develop a comprehensive understanding of the threat environment.
- Coordinate between the United States and Mexico and Central American partners to support strengthened border security and continued expansion of travel enforcement through preclearance operations.

Objective 3: Strengthen coordinated border enforcement globally

Intended Outcome: Lead a more resilient global network of border security capabilities

Key Capabilities:

- International engagement
- Joint operational planning

Associated Activities, Technology, and Resources:

- Technical assistance
- Training
- Capacity building

FY 2018 – 2020 Milestones:

- Strengthen interagency and international partnership to support joint operations across regions of the Western Hemisphere to interdict the trafficking of narcotics and illicit goods.

IV. Border Security Initiatives and Implementation Plans

Pursuant to the legislative language directing submission of this document, the following section identifies planned initiatives and projects “for improving security along the borders of the United States, including the use of personnel, fencing, other forms of tactical infrastructure, and technology.” These initiatives and projects are based on the initiatives identified in the 2017 BSIP, and are updated on the basis of changes in the threat environment and an assessment of CBP’s ability to achieve the goals and objectives described in Section III.

The following investment initiatives represent the current requirements that CBP has identified and is working to implement within current funding. Ongoing evaluation of these and future investment opportunities is a necessary element in the process of continuously improving border security. CBP is executing deliberative acquisition programs in accordance with DHS Management Directive 102-01. The acquisition process includes a disciplined approach that ensures the clear definition of requirements and a rigorous assessment of options and means to meet those requirements. The process also breaks down the acquisition progress into stages allowing for approval (or disapproval, as appropriate) of procurement recommendations and close oversight of the execution of contracts and the deployment of infrastructure and technology. CBP also conducts its operational requirements work in accordance with DHS “Joint Requirements Integration Management System,” policy D107-01.

Most of the identified initiatives are being implemented concurrently with enacted FY 2018 appropriations, with others to be funded potentially in FY 2019 or in future years. Taken together, these projects represent CBP’s current program for ensuring comprehensive border security. Actual funding amounts for FYs 2019-2027 are yet to be determined and will be addressed in future budget cycles.

Consistent with CBP’s multipronged approach, the projects are presented using the following categories: Between the POEs, At the POEs, and Beyond the Borders. An additional initiative is listed in an enterprise-wide category because it would benefit all areas of border security. A summary listing of proposed or in-process investment initiatives follows.

FY 2018 BSIP Initiatives			
	FY 2018 Request	FY 2018 Enacted	FY 2019 Request
Between the POEs			
Personnel			
1. USBP Agents and Related Mission Support Personnel	\$164.6M	\$24.6M	\$164.3M
2. USBP Agent Relocations	\$11.0M	\$21.0M	\$45.1M
3. Air and Marine Operations (AMO)	\$23.2M	\$0	\$0

FY 2018 BSIP Initiatives			
	FY 2018 Request	FY 2018 Enacted	FY 2019 Request
Enforcement and Related Support Personnel			
Facilities, Equipment, and Technology			
4. USBP Facilities Modernization and Expansion	\$45.0M (Brown Field Border Patrol Station (BPS))	\$45.0M (Brown Field Border Patrol Station (BPS))	\$33.4M (Freer BPS)
5. USBP Facilities Maintenance and Construction (IT Management)	\$7.6M	\$4.5M	\$4.5M
6. AMO Facilities Maintenance & Repairs	\$28.7M	\$27.8M	\$27.9M
7. USBP Field Mobility: Vehicles, Boats, and Transportation	Vehicles: \$73.2M	Vehicles: \$93.2M	Vehicles: \$81.9M
	Airboats \$0.9M	Airboats \$0.9M	
	Transportation \$45.2M	Transportation \$45.2M	Transportation \$45.2M
8. Tactical Air, Land, & Marine Enterprise Communications	\$54.1M	\$54.1M	\$48.9M
9. Border Patrol Enforcement System (BPES)	BPES: \$34.9M	BPES: \$37.9M	BPES: \$44.9M
	Unattended Ground Sensors (UGS) O&S: \$3.2M UGS PC&I: \$20.0M	UGS O&S: \$3.2M UGS PC&I: \$20M	UGS O&S: \$6.8M UGS PC&I: \$0
10. Integrated Fixed Towers (IFT) and Block 1	IFT O&S: \$22.4M IFT PC&I: \$17.4M	IFT O&S: \$12.6M IFT PC&I: \$39.2M	IFT O&S: \$22.0M IFT PC&I: \$2.0M
	Block 1 O&S: \$13.3M	Block 1 O&S: \$13.3M	Block 1 O&S: \$12.8M
11. Mobile Video Surveillance Systems (MVSS)	O&S: \$3.2M PC&I: \$1.6M	PC&I: \$46.8M	O&S: \$13.4M PC&I: \$1.6M
12. Remote Video Surveillance Systems (RVSS)	SWB RVSS O&S: \$20.0M PC&I: \$46.2M	SWB RVSS O&S: \$20.0M PC&I: \$87.2M	SWB RVSS O&S: \$27.4M PC&I: \$43.7M
	Northern Border RVSS: O&S: \$8.0M	Northern Border RVSS: O&S: \$8.0M	Northern Border RVSS: O&S: \$8.1M
		PC&I: \$7.0M	

FY 2018 BSIP Initiatives			
	FY 2018 Request	FY 2018 Enacted	FY 2019 Request
13. Linear Ground Detection System (LGDS)	O&S: \$0.5M	O&S: \$0.5M PC&I: \$16.0M	O&S: \$1.0M
14. Maritime Detection Project (MDP)	PC&I: \$0.0M	O&S: \$2.4M PC&I: \$9.0M	O&S: \$2.9M
15. California Coastal Surveillance (CCS)	O&S: \$1.0M	O&S: \$1.9M	O&S: \$1.4M
16. USBP Mobile Surveillance Capability	O&S: \$16.2M	O&S: 16.2M PC&I: \$8.0M	O&S: \$17.4M PC&I: \$0.0M
17. USBP Tactical Aerostats	\$34.6M	O&S: \$32.1M PC&I: \$2.7M	O&S: \$44.0M PC&I: \$0
18. USBP Handheld Surveillance Equipment	\$0	PC&I: \$3.0M	\$0
19. Cross Border Tunnel Threat (CBTT) Program	PC&I: \$9M	PC&I: \$42.0M	\$0
20. AMO Fortify DHC-8 Fleet	PC&I: \$13.3M	PC&I: \$13.3M	\$0
21. AMO Fortify Multi-Role Enforcement Aircraft (MEA) Fleet	PC&I: \$55.5M	PC&I: \$77.5M	PC&I: \$56.7M
22. AMO Fortify Air and Marine Fleet	O&S: \$18.1M PC&I: \$93.1M	O&S: \$18.1M PC&I: \$117.8M	O&S: \$7.9M PC&I: \$22.8M
23. AMO Unmanned Aircraft System (UAS) Acquisition & Expansion	\$0	O&S: \$15.0M	\$0
24. AMO Fortify P-3 Aircraft Fleet	\$0	\$0	\$13.6M
25. AMO Minotaur Implementation	\$0	\$0	\$0
26. AMOC System Upgrades	\$0.9M	\$0.9M	\$0
27. AMO Federal Aviation Administration Next Generation	PC&I: \$3.3M	PC&I: \$3.3M	PC&I: \$3.7M
28. AMO Tasking, Operations, & Management Information System (TOMIS)	\$3.8M	\$3.8M	\$3.8M
29. USBP Small UAS	\$2.5M	O&S: \$12.5M PC&I: \$10M	\$0

FY 2018 BSIP Initiatives			
	FY 2018 Request	FY 2018 Enacted	FY 2019 Request
Tactical Infrastructure			
30. Border Wall and Fencing			
a. New Wall System	\$1,282.2M	\$641.0M	\$1,600.0M
b. Replacement Primary Wall	\$0	\$445.0M	
c. Replace Secondary Wall	\$251.0M	\$251.0M	
d. Wall Planning	\$38.0M	\$38.0M	
31. AMO Tethered Aerostat Radar System Enhancements	\$0	\$3.2M	\$0.0M
At the POEs			
Personnel			
32. NTC Staff Expansion	\$10.0M	\$10.0M	\$16.7M
Facilities, Equipment and Technology			
33. NTC Intelligence and Targeting System Upgrades	\$54.9M	\$52.4M	\$65.1M
34. Land POE Projects			
a. CBP PC&I Budget	PC&I: \$14.8M	PC&I: \$14.8M	PC&I: \$14.8M
b. U.S. General Services Administration Federal Buildings Fund	\$507.0M	\$254.8M	\$275.9M
35. Biometric Entry-Exit	\$71.0M	Fee Funded	Fee Funded
36. Arrival and Departure Information System (ADIS)	\$27.0M	\$27.0M	\$27.0M
37. Electronic Visa Update System (EVUS)	\$27.7M	\$27.7M	\$27.7M
38. Immigration Advisory Program (IAP)	\$9.2M	\$9.2M	\$14.2M
39. Preclearance	\$70.3M	\$70.3M	\$70.8M
40. CBP Mobile Technology	\$12.0M	\$12.0M	\$12.0M
41. OFO Non-Intrusive Inspection Acquisitions	\$109.2M	\$224.6M	\$44.2M
42. Border Security Deployment Program (BSDP)	\$11.1M	\$11.1M	\$11.1M
43. Opioid Testing and Safety Expansion	\$0	\$30.5M	\$0
44. Customs-Trade Partnership Against Terrorism (C-TPAT)	\$40.0M	\$40.0M	\$40.5M

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FY 2018 BSIP Initiatives			
	FY 2018 Request	FY 2018 Enacted	FY 2019 Request
45. Container Security Initiative	\$62.8M	\$50.8M	\$71.6M
46. OFO Agricultural Risk Detection	\$0	\$0	\$0
47. OFO Primary/Secondary IT Refresh	\$0	\$0	\$0
Enterprise-wide			
48. Office of International Affairs – International Diplomacy Mission	\$39.7M	\$35.1M	\$44.2M
49. Enhance Law Enforcement Safety & Compliance (LESC) Staffing & Procurement	\$45.5M	\$0	\$40.5M
50. Office of Intelligence Staffing Increases	\$34.0M	\$37.3M	\$47.8M
51. Intelligence Capability Increases	\$16.9M	\$16.5M	\$16.8M
52. Laboratory and Forensic Support Expansion	\$0	\$0	\$0

Detailed descriptions of newly developed investment initiatives are provided below and on the following pages. These descriptions are not provided in a priority order. The numbering associated with each priority initiative is intended only for ease of reference. Each initiative is accompanied by a brief description, an explanation of the outcomes that it is intended to influence, an overview of the costs, milestones for implementation, a description of any methods used to identify the solution, and any methods used to evaluate effectiveness.

2018 BSIP Initiative # 1: National Vetting Center

OVERVIEW: National Security Presidential Memorandum 9, *Optimizing the Use of Federal Government Information in Support of the National Vetting Enterprise*, signed on February 6, 2018, established the NVC to be led by DHS. The Secretary subsequently delegated this authority to CBP. National Security Presidential Memorandum 9 requires a 180-day implementation plan, which was completed and submitted to the Administration on August 15, 2018 and subsequently approved by the President. NVC resourcing requirements constituted a significant portion of the FYs 2020-2024 Winter Study, titled “Enhancing Screening & Vetting through Information Sharing.”

AFFECTED CAPABILITIES:

- Screening
- Scanning

- Targeting and vetting
- Intelligence
- Analysis

RELATED OUTCOMES:

BSIP Goal 1, Objective 3: Strengthen CBP's counter-network approach across all aspects of CBP's mission set to attack and disrupt criminal and terrorist networks

IMPLEMENTATION PLAN

- (b)(7)(E)
- DHS will need to support the continuing development of the Joint Worldwide Intelligence Communication System-based results hub and case management viewer.
- NVC will require oversight and other support personnel.
- (b)(7)(E)
- DHS components such as CBP, USCIS, and ICE may need to support (b)(7)(E)
- (b)(7)(E)

2018 BSIP Initiative # 2: Intelligent Trade Enforcement, Analytics, and Systems

OVERVIEW: Intelligent Trade Enforcement is a key part of *Trade Strategy 2020*, which is a comprehensive approach to addressing several mandates and capability gaps for CBP trade operations identified by the Department and the Administration as detailed in Executive Order 13785: *Establishing Enhanced Collection and Enforcement of Antidumping and Countervailing Duties and Violations of Trade and Customs Laws*.

Intelligent Trade Enforcement aims to protect U.S. economic viability by subverting trade networks that finance illicit activity. This approach will enhance targeting (b)(7)(E)

(b)(7)(E)

(b)(7)(E) Intelligent enforcement also will enable CBP to:

- Increase controls over revenue in critical areas and reduced revenue loss, and improve analytics for comprehensive risk management;
- Expand CBP's common intelligence picture focused on illicit trade threats and supply chain dynamics via information and intelligence product development by the Trade Intelligence Division and CBP's Intelligence Enterprise partners;
- Develop new functions for financial, account, network, and pattern-based targeting;

- Integrate activities at tactical (port), operational (Centers of Excellence and Expertise, National Threat Analysis Centers), and strategic (Headquarter) levels through federated view;
- Develop more efficient regulations, policies, and systems to manage volumes and shifts in patterns, and to improve facilitation; and empower employees with skills, strategies, and the means to manage next-generation trade environment.

AFFECTED CAPABILITIES:

- Risk assessments
- Analysis
- Screening
- Scanning
- Information sharing and dissemination

RELATED OUTCOMES:

BSIP Goal 2, Objective 2: Enhance impedance and denial of illegal border crossings

BSIP Goal 3, Objective 2: Increase ability to address border security risks as early as possible

Intelligent enforcement will result in:

- Accomplishing the Executive Order 13785 on antidumping and countervailing duties, which would enhance bonding recommendations;
- Developing an analytics capability that complements Automated Commercial Environment (ACE) cargo processing and Automated Targeting System targeting;
- Building (b)(7)(E) targeting capability in the Automated Targeting System;
- Creating a federated view of importers;
- Developing simplified processes and deploying ACE enhancements; and
- Establishing a staff model for the modern trade environment.

IMPLEMENTATION PLAN: The Intelligent Trade Enforcement initiative has been prioritized by agency leadership and focuses on the central core of *Trade Strategy 2020*. This initiative puts advanced data analytics tools into the hands of users to provide them with new decision-making tools and information. CBP anticipates exploring the pursuit of a new “federated view” capability that consolidates importer data and enforcement workflows, to ensure that CBP operators and analysts have an integrated awareness of activities for an importer at all levels.

(b)(7)(E)

The initiative also will support additional ACE enhancements, including planned simplification of billing and statements, the creation of monthly import declarations and summaries, and consolidated liquidation processes in support of antidumping and countervailing duties administration. These will result in increased efficiencies for trade and CBP, better risk management, and the anticipated reduction of burdensome processing and storage requirements that support long-term liquidation and billing.

2018 BSIP Initiative #3: Personnel Recovery

OVERVIEW: Presidential Policy Directive-30 directs that “each agency with overseas responsibilities shall inform its employees of U.S. policy regarding hostage takings, and provide personnel recovery preparation, education, and training programs to help their employees understand the risk environment, evade capture, survive captivity, minimize their vulnerability to exploitation, and enable their recovery from a threat environment.” On October 4, 2016, the CBP Commissioner’s Priorities and Key Deliverables for FY 2017 memorandum included the following:

- CBP will develop a force protection pre-deployment training plan to prepare all deploying CBP employees for the risks of international travel and assignments.
- CBP will develop a Personnel Recovery Program that addresses policies, training, and infrastructure – consistent with Presidential Policy Directive-30, to prepare CBP employees for travel to high-threat countries and enable their recovery from a threat environment.

AFFECTED CAPABILITIES:

- International engagement
- Information sharing
- Joint operational planning with DOS and other federal partners
- Risk assessments
- Analysis

RELATED OUTCOMES:

BSIP Goal 3: Lead a resilient network of border enforcement capabilities

Objective 1: Expand information- and intelligence-sharing partnerships

Objective 2: Increase ability to address border security risks as early as possible

Objective 3: Strengthen coordinated border enforcement globally

IMPLEMENTATION PLAN:

- Establish CBP personnel recovery policy
- Finalize personnel recovery training requirements that also meet State Department Foreign Affairs Counter Threat and High Threat Security Overseas Seminar training requirements

2018 BSIP Initiative #4: Cloud Migration

OVERVIEW: The CBP Office of Information and Technology (OIT) actively is pursuing cloud migration to reduce technical debt and transform the way that the agency delivers IT solutions to its mission customers. Moving to the cloud is more than an opportunity to move the existing portfolio from an onsite data center to the cloud, it is a long-term effort to streamline, rationalize, and standardize our services. Thus far, the migration effort has taken time, effort, and energy, above and beyond OIT's day-to-day responsibilities. OIT has achieved important milestones in the Data Center Migration effort across several critical areas: security, applications, infrastructure & design standards, and network.

AFFECTED CAPABILITIES:

- **Targeting:** Targeting and Analysis Systems Program Directorate has supported CBP in expanding the Biometric Exit Program across additional airports both international and domestic, while also communicating with additional airlines for biometric screening adoption.
- **Mobility:** Enforcement applications will become available in the cloud to include: Biometric Air Exit (Prod), Biometric Air Entry (Prod), Trusted Traveler Program, CBP.gov, Reporting Offsite Arrival-Mobile, and the OIT Dashboard. Furthermore, the Mobility Center of Excellence & Expertise has been working with customers across CBP to prototype and deploy cloud native mobile applications that address emerging needs. These applications are built using CBP's common application framework, with reusable architecture and consistent branding.
- **Passenger Processing:** Passenger Systems Program Directorate is expanding development work across a section of targeted applications within TECS and e-Business systems to support eventual migration to Cloud East.

RELATED OUTCOMES:

BSIP Goal 1, Objective 1: Increase situational awareness

BSIP Goal 2, Objective 1: Expand operational readiness

BSIP Goal 2, Objective 2: Enhance impedance and denial of illegal border crossings

BSIP Goal 2, Objective 3: Ensure agility for appropriate and timely law enforcement responses

IMPLEMENTATION PLAN: The OIT Migration Plan comprises four major phases that the IT Migration Project will execute in an iterative process to leverage new methods and technologies and incorporate lessons learned throughout the life of the engagement. CBP has developed a plan that will drive migration and optimization efforts, continue cloud-computing initiatives, and promote enterprise solutions to help OIT operate an efficient migration to the cloud. This approach will help OIT to understand their portfolio better and assess and prioritize migration efforts.

- Discovery Phase: Create an inventory of systems and applications, including current-state architecture, design goals, and future-state hosting requirements.
- Cloud Suitability Assessment & Rationalization: Perform disposition analyses to address business process alignment and high-level cloud suitability. Applications are analyzed and assigned a transformation readiness “score” as an output, and revisions occur in an iterative fashion to gain efficiencies.
- Migration Course of Action Decision: Select a subset of systems for further future-state detailed assessment. Conduct technical engineering assessments to explore further the future-state architecture, sizing requirements, and application linkages and dependencies.
- Project Implementation: Generate a final system prioritization list for a transformation roadmap. Target platforms and identify and prioritize adoption waves to allow CBP to test its cloud strategy. Incorporate lessons learned to improve future projects and yield more accurate costing evaluations.

V. Ensuring Accountability in Border Security

A. Measuring OPCON and Security at the Immediate Border

In compliance with Executive Order 13767, CBP is reinstituting achieving OPCON between the POEs across the entirety of the Southern Border as its overarching goal to ensure that:

- Illegal entries across the U.S. border with Mexico are impeded and denied by sufficient walls, fencing, and other physical and natural barriers;
- USBP agents have a high level of situational awareness that includes near-term predictions of potential illegal entry attempts, as well as an ever-increasing capability to detect illegal entries as they occur; and
- USBP agents can respond efficiently to and interdict illegal entries of people or contraband by training, equipping, and enhancing availability of all agents.

CBP will measure OPCON directly via three elements: impedance and denial (including wall and other barriers, as well as measures of recidivism); situational awareness (including technologies that allow USBP to detect, identify, and track illegal entries, and intelligence capabilities); and law enforcement resolution (including the ability to respond to detections and make a final apprehension). Each of these elements will be evaluated and calculated via a host of subordinate measures currently in development. To aid in the transition to OPCON, DHS recently endorsed an Agency Priority Goal that will begin in FY 2018 and end in FY 2020, to allow for the establishment of a border security end state between POEs along the Southern Border by implementing the OPCON framework to articulate success and direct resources.

Concurrently, technological advances at the border over the past several years have increased situational awareness significantly. Among the three elements of OPCON, situational awareness is a major cornerstone. It combines domain awareness with intelligence data and other information to give USBP the best possible knowledge of how much illicit activity is occurring at the border and what that activity is. In turn, increased situational awareness has allowed USBP to begin pursuing modeling efforts based on the Department's more complete information about illegal entry attempts. (b)(7)(E)

(b)(7)(E)

(b)(7)(E)

Increasing situational awareness narrows the gap between the known and unknown flow, and puts DHS in a position to build ever better observational estimates of border security.

In the interim, USBP will continue to explain its performance using its risk methodology via State of the Border reporting, in addition to reporting numerous measure results under the structure set out in the Government Performance and Results Act Modernization Act (GPRAMA) structure. USBP's most notable GPRAMA measures are the interdiction

effectiveness rate and the percent of people apprehended multiple times along the Southern Border (recidivism rate). Both of these measures are reported publicly in addition to contributing to USBP “State of the Border Metrics.” In addition, in September 2017, DHS produced an estimate of border security between POEs report⁹ that provides details on an array of indicators that, when combined, provide insight into the state of border security between the POEs on the SWB. More specifically, this report provides indicators within two overarching categories: estimated enforcement outputs and estimated enforcement outcomes.

B. Border Security in the Air and Maritime Environment

CBP’s measures under the GPRAMA in the air and maritime environments complement those reported by USBP and OFO to provide a more complete picture of border security. The two primary measures described below parallel the concepts discussed above because they contribute to CBP’s awareness of activities in the border environment while also assessing the ability to act upon that knowledge. The two GPRAMA measures that CBP’s AMO uses include:

- *Percent of detected conventional aircraft incursions resolved along all borders of the United States:* This measure represents the percentage of conventional aircraft detected visually or by sensor technology, which is suspected of illegal cross-border activity and is brought to a successful law enforcement resolution.
- *Air Mission Launch Rate:* This represents AMO’s capability and/or capacity to launch an aircraft when a request is made for aerial response. This measure captures the percent of all requests made for aircraft to which AMO was able to respond.

C. Border Security Measures at the POEs

OFO manages the lawful access of people and goods to the United States by securing and expediting international trade and travel at the POEs. CBP enforces the customs, immigration, and agricultural laws of the United States, together with the laws and regulations of other government entities at the border, such as ICE, DOS, U.S. Department of the Treasury, the Food and Drug Administration, Consumer Product Safety Commission, U.S. Department of Agriculture, and HHS, among others.

Every traveler and cargo shipment seeking entry to the United States by air, land, or sea through one of the 328 POEs must present themselves to CBP Officers, who determine admissibility and identify violations of the law and potential threats to public safety. OFO works to identify risks and potential threats at the earliest possible moment in the trade and travel process by using the most current law enforcement and targeting information assembled by the (b)(7)(E) to screen both individual travelers and cargo shipments. The (b)(7)(E)

⁹ https://www.dhs.gov/sites/default/files/publications/17_0914_estimates-of-border-security.pdf

(b)(7)(E)

security risks of cargo shipments. (b)(7)(E) uses a wide array of law enforcement data sources, as well as information that must be provided by shippers in advance of arrival at the POE, to assess the security risks of cargo shipments before they arrive. (b)(7)(E)

(b)(7)(E)

(b)(7)(E)

In addition, DHS uses automated systems and enforcement operations to ensure that persons, shipments, and conveyances departing the United States are in compliance with U.S. laws and regulations. The goal of the outbound enforcement effort is to disrupt/dismantle criminal enterprises, terrorist organizations, and rogue nations by seizing illegal firearm shipments and smuggled currency, interdicting illegal exports of controlled/sensitive commodities, and arresting members or associates of these organizations.

Travel and trade continue to grow steadily, together with expanding mission requirements, challenging CBP efforts to secure the border at the POEs. During FY 2017, OFO inspected more than 397 million travelers, conducted more than 34.2 million traveler secondary exams, screened more than 104 million privately owned vehicles, conducted more than 4 million privately owned vehicle secondary exams, conducted more than 19.6 million passenger agricultural inspections, and prevented more than 216,000 inadmissible aliens from entering the United States illegally. On the cargo side, OFO inspected 11.8 million truck containers and conducted physical examinations on more than another 2.7 million, inspected more than 28 million sea containers and physically examined an additional 5.2 million, conducted nearly 1.8 million agricultural cargo and conveyance inspections, and made more than 128,000 pest interceptions. Overall, OFO made nearly 40,000 seizures of contraband, including narcotics, currency, and weapons, and more than 19,600 arrests.

In addition to tracking, monitoring, and reporting an extensive array of operational data on passenger and trade inspection and enforcement activity, OFO uses a number of high-level organizational measures to provide a broader assessment of border security at the POEs:

- *Percentage of inbound cargo identified by CBP as potentially high-risk that is assessed or scanned prior to departure or at arrival at a U.S. POE:* This is a comprehensive measure that covers the sea, air, and land modes for all cargo destined to arrive at the POEs. Screening and resolving potentially high-risk cargo prior to or at arrival at the POEs ensures the safety of the U.S. public and minimizes the impact to trade through the effective use of risk-focused targeting.
- *Amount of smuggled outbound currency seized at the POEs:* Covers outbound operations conducted across all POEs.
- *Number of smuggled outbound weapons seized at the POEs:* Covers outbound operations conducted across all POEs. Does not include administrative holds and seizures that were released later for shipment upon corrective action.

- *Compliance rate for CTPAT members with the established CTPAT security guidelines:* Compliance with the CTPAT security guidelines ensures that CTPAT trade partners are implementing the CBP-advised internal security practices and meeting industry-specific security standards.
- *Cost savings benefit for CTPAT members:* Represents the savings that a CTPAT partner achieves through membership in the program. Uses the number of examinations that the partner does not undergo because of membership and the nationally averaged dollar cost by transportation mode (air, rail, truck, and vessel) of an examination. New measure for FY 2018.
- *Percentage of Global Entry and other Trusted Traveler program members with no security-related revocations:* Trusted Traveler members are vetted recurrently against derogatory information to maintain eligibility for the program. New measure for FY 2017.
- *Percentage of air passengers compliant with laws, rules, and regulations:* Measures compliance with all the laws, rules, and regulations enforced at the international airports on behalf of CBP and all other agencies that CBP supports, as tasked by Congress, with the exception of agricultural laws and regulations.
- *Percentage of land border passengers compliant with laws, rules, and regulations:* Measures compliance with all the laws, rules, and regulations enforced at the land border POEs on behalf of CBP and all other agencies that CBP supports, as tasked by Congress, with the exception of agricultural laws and regulations.
- *Percentage of international air passengers compliant with Agricultural Quarantine Regulations:* Measures compliance with all the agricultural quarantine laws and regulations enforced at the international airports on behalf of CBP and U.S. Department of Agriculture, as tasked by Congress.
- *Percentage of border vehicle passengers compliant with Agricultural Quarantine Regulations:* Measures compliance with all the agricultural quarantine laws and regulations enforced at the land border POEs on behalf of CBP and the U.S. Department of Agriculture, as tasked by Congress.
- *Percentage of individuals screened against law enforcement databases for entry into United States:* Measures the success rate of electronically screening and vetting all travelers against the major law enforcement databases used by CBP to ensure that CBP has as much information as possible about every individual.

VI. Conclusion

A. Future Planning

The 2018 BSIP provides CBP with a framework to analyze and prioritize planning to improve border security. It begins by establishing a common understanding of the meaning of border security as a function of:

- Knowing what is happening in the border environment,
- Having the ability to act or respond to that knowledge, and
- Cultivating partnerships that enhance knowledge and ability to act.

Strengthening border security is an ongoing and iterative process. The initiatives detailed in this document provide actions and milestones supporting the goals and objectives in this plan, and they represent current known requirements. As CBP continuously strengthens border security, these initiatives will be evaluated for their ongoing contributions to improving border security.

1. Mitigating Outside Influences

A comprehensive approach to border security must recognize that there are many factors beyond DHS's control that affect border security. Those factors can increase or decrease the demands on DHS, which, in turn, may affect DHS's operational footprint and requirements.

For example, many sociological factors naturally affect border security. This includes factors that “pull” people to enter the United States and “push” them from their homelands. The state of the economy, political climate, corruption, crime rates, and disease outbreaks all can work as “push” factors to encourage people to leave their home country. Conversely, the state of the U.S. economy, the U.S. legal system, the effectiveness of internal enforcement, the availability of social services, and the U.S. political climate all can work as “pull” factors encouraging people to attempt to cross our borders illegally. The number of people influenced by these push and pull factors has an impact on DHS. More people seeking to enter the country (at or between the ports) requires an increase in CBP personnel and resources to achieve a constant level of border security. Thus, any assessment that CBP conducts of the resources that it needs to ensure border security will always depend on assumptions about these outside influences.

U.S. legal and governmental elements and considerations also will affect border security. For example, national policies on immigration affect border security. Similarly, a legal framework facilitates effective border security if it empowers law enforcement personnel with appropriate authority to detect, and apprehend those who attempt to enter the United States illegally. This legal framework also should support frontline law enforcement personnel by instituting efficient processes for removing individuals who enter the United States contrary to law. Conversely, a

legal system that does not meet these benchmarks, is an impediment to border security. The governmental considerations that affect border security are complicated further by the fact that there are many federal agencies that have a role in the flow of goods or people into and out of the United States. The efficiency with which these agencies work together and the effectiveness of interagency collaboration naturally will affect DHS's role in securing the border.

2. Immigration Reform

While a comprehensive approach to border security necessarily must include active support to all of DHS's layered enforcement efforts, it also must include many other elements. For example, an effective immigration system often begins with effective legal processes. If individuals do not face adequate consequences for illegally entering the United States, such as removal or prosecution, then those individuals and others are incentivized to try to cross the border illegally.

An effective system of immigration should include statutory provisions that enable DHS and its partner enforcement agencies to apprehend, process, review, and return quickly those individuals who attempt illicit crossings at our borders who are not otherwise eligible for an immigration benefit. Additionally, an effective system would enable those who are entitled to enter the United States legally with a safe, understandable, timely and efficient legal process.

The development of such a system requires the participation of Congress and the other federal agencies involved in immigration enforcement including, but not limited to, USCIS, ICE, the Department of Justice, and DOS. For example, Congress may develop a more effective immigration system through statutory changes. Although any legislative changes to immigration or other legal authorities may not always affect CBP directly, the development of a more efficient immigration system will enhance CBP's ability to perform its mission in securing the border and enforcing U.S. laws. CBP also is committed to working with Congress and law enforcement partners to share its institutional knowledge of the border to suggest opportunities to improve and enhance the effectiveness of the legal framework within which it operates.

3. Consultation

DHS recognizes the importance of consultation and frequently consults with federal stakeholders such as the Department of the Interior and the Environmental Protection Agency concerning environmental impacts related to the construction of border barriers, to include impacts to the Santa Ana National Wildlife Refuge. In the spring of 2017, CBP initiated coordination with the U.S. Department of Interior, U.S. Fish & Wildlife Service, and U.S. Environmental Protection Agency to inform them of the planning, design, and construction phases of the border wall system, and to consult U.S. Fish & Wildlife Service on resources that may be present in project areas, as well as potential impacts and mitigation measures in order to minimize or eliminate impacts to the environment.

Since these initial discussions, CBP has conducted additional meetings with the U.S. Environmental Protection Agency, U.S. Department of Interior, and other federal and state agencies on CBP's FY 2018 wall projects to incorporate their concerns and considerations. CBP also soon will be conducting biological and cultural surveys in the project area within the Rio Grande Valley Sector for its FY 2018 projects. An analysis of the potential impacts from these projects will be prepared once all of the data are collected and further consultation with resource agencies is completed.

CBP's ongoing consultation includes but is not limited to federal land managers, the U.S. Fish and Wildlife Service, Native American tribes, and State Historic Preservation Officers to obtain information related to the presence of natural and cultural resources within the project area, as well as to identify construction best management practices and any appropriate mitigation measures.

VII. Appendices

Appendix A. List of Acronyms

Acronym	Definition
ACE	Automated Commercial Environment
ADE	Acquisition Decision Event
AMO	Air and Marine Operations
ASO	Alien Smuggling Organization
BIEC	Border Interagency Executive Council
BPRT	Border Patrol Enterprise Reporting Tool
BPES	Border Patrol Enforcement System
BSIP	Border Security Improvement Plan
CAVSS	Centralized Area Video Surveillance System
CBP	U.S. Customs and Border Protection
CBTT	Cross-Border Tunnel Threat
CCS	Cargo Conveyance and Security
CCTV	Closed Circuit Television
CDS	Consequence Delivery System
CDS-PMO	CDS Project Management Office
CERTS	Cargo Enforcement Reporting and Tracking System
CM	Configuration Management
CRD	Capabilities and Requirements Division
CSM	Container Status Message
CTPAT	Customs-Trade Partnership Against Terrorism
D/EAC	Deputy Executive Assistant Commissioner
DHS	U.S. Department of Homeland Security
DOS	U.S. Department of State
DTO	Drug Trafficking Organization
ECCF	Express Consignment Carrier Facility
EIAB	Economic Analysis Branch, Regulations and Rulings
ES	Enterprise Services
ESD	Enforcement Systems Division
FISMA	Federal Information Security Management Act
FM&E	Facilities Management and Engineering Office
FROB	Foreign Cargo Remaining On Board
FSLT	Federal, State, Local, and Tribal
FTZ	Foreign Trade Zone

Acronym	Definition
FY	Fiscal Year
GAO	U.S. Government Accountability Office
GPRAMA	Government Performance and Results Act Modernization Act
HHS	U.S. Department of Health and Human Services
HRBE	Human Resources Business Engine
HRM	Office of Human Resources Management
ICE	U.S. Immigration and Customs Enforcement
IE	Immediate Exportation
IFT	Integrated Fixed Tower
IMF	International Mail Facility
ISC	Interagency Security Committee
ISF	Importer Security Filing
ISR	Intelligence, Surveillance, and Reconnaissance
IT	Information Technology
JICMS	Joint Integrity Case Management System
JRC	Joint Requirements Council
LER	Labor and Employee Relations
LESC	Law Enforcement Officer Safety and Compliance Directorate
LSS	Laboratories and Scientific Services
NII	Non-Intrusive Inspection
NTC	National Targeting Center
NVC	National Vetting Center
NVOCC	Nonvessel Operating Common Carriers
NYFO	New York Field Office
O&S	Operations and Support
OCC	Office of Chief Counsel
OFO	Office of Field Operations
OI	Office of Intelligence
OIG	Office of Inspector General
OIT	Office of Information Technology
OPCON	Operational Control
OPR	Office of Professional Responsibility
OPS	Operations Directorate
OS	Operations Support
OT	Office of Trade
OTD	Office of Training and Development
PARE	Planning Analysis Requirements & Evaluation Directorate
PBG	Patrol Border Group
PC&I	Procurement, Construction, and Improvements

Acronym	Definition
POA&M	Plan of Action and Milestones
POC	Point of Contact
POE	Port of Entry
PSPPH	Physical Security Policy and Procedures Handbook
RFD	Request for Development
RVSS	Remote Video Surveillance Systems
SAMEPH	Seized Asset Management and Enforcement Procedure Handbook
SIP	Self-Inspection Program
SME	Subject Matter Expert
SOP	Standard Operating Procedure
SWB	Southwest Border
SWS	Single Window Sustainment
T&E	Transportation and Exportation
TCO	Transnational Criminal Organization
TVPRA	Trafficking Victims Protection Reauthorization Act of 2008
UAC	Unaccompanied Alien Children
UAS	Unmanned Aerial System
UGS	Unattended Ground Sensors
USBP	U.S. Border Patrol
USCIS	U.S. Citizenship and Immigration Services
USPS	U.S. Postal Service
VADER	Vehicle and Dismount Exploitation Radar
WMDD	Weapons of Mass Destruction Division

Appendix B. List of Open U.S. Government Accountability Office (GAO) and Office of Inspector General (OIG) Recommendations Regarding Border Security

OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
USBP	GAO-09-824	Establish internal controls for management oversight of the accuracy, consistency, and completeness of checkpoint performance data.	CBP provided GAO with its Traffic Checkpoint Policy, draft Checkpoint Operation Manual, Chief's memorandum on limiting operational vulnerability, Chief's memorandum on checkpoint data integrity, and Chief's memorandum on the UTEP & BORDERS checkpoint study. In addition, CBP has established a checkpoint program management office. CBP accomplished all the milestones by November 2016, and CBP continues to work with GAO to close the recommendation. On June 13, 2018, the revised checkpoint policy was submitted for final review and approval.
USBP	GAO-09-824	Implement the quality of life measures that have been identified by the Border Patrol to evaluate the impact that checkpoints have on local communities. Implementing these measures would include identifying appropriate data sources available at the local, state, or federal level, and developing guidance for how data should be collected and used in support of these measures.	The requirements have been drafted and sent to U.S. Border Patrol's (USBP) Enforcement Systems Division (ESD) to update metrics on the Border Patrol Enterprise Reporting Tool (BPERT) page for visibility to the field. The report is built but pending internal vetting/ approval prior to being pushed out to E3.
USBP	GAO-09-824	In connection with planning for new or upgraded checkpoints, conduct a workforce planning needs assessment for checkpoint staffing allocations to determine the resources needed to address anticipated levels of illegal activity around the checkpoint.	CBP continues to address this recommendation. The beta version of the Patrol Border Staffing Model was completed and fielded at the Chief Patrol Agent's conference in July 2018. This model examines the relationship of workload and conditions per Patrol Border Group (PBG) agent; provides beta version information regarding effects of workload (e.g., flow, apprehensions, seizures, other agency calls, sensor hits) and conditions (e.g.,

OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
			miles of border without barrier, total area of responsibility, surveillance score) on staffing levels; examines minimal to current staffing requirements; and provides relationships of workload and conditions to the Essential Mission Function staffing level. CBP developed work studies to lay the groundwork for developing staffing model/tools. These studies provide the factors, data, and analyses that determine how the staffing model and tools will be constructed. PBG and Sector Intelligence Unit work studies have been completed at all sectors. Special operations work studies with the Special Operations Group, and all sectors with Special Operations Division have been completed. Resulted in enhanced online surveys for data collection on all sectors and stations. The remaining work studies will be conducted for the following: Operational Programs and Mission Readiness Operations personnel. The initial work study version for Operational Programs and Mission Readiness Operations personnel were reviewed at the onsite visits in the Miami (August) and Rio Grande Valley Sectors (September). The online version is underway. CBP continues to collect data to develop and implement models for additional essential mission functions.
USBP	GAO-09-824	Use the information generated from the quality of life measures to inform resource allocations and address identified impacts.	The requirements have been drafted for USBP's ESD to capture criminal aliens apprehended at checkpoints. The number of drugs/narcotics apprehended at checkpoints has been integrated within BPERT for each sector. The Checkpoint Management Office will monitor the data and an informational page will be auto-

OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
			generated for sectors to have visibility. The report is built but is pending internal vetting/approval prior to being pushed out to E3.
USBP	GAO-14-165SU and GAO-14-368 (rec6)	Once data on asset assists are required to be recorded and tracked, analyze available data on apprehensions and seizures and technological assists, in combination with other relevant performance metrics or indicators as appropriate, to determine the contribution of surveillance technologies to its border security efforts.	CBP provided GAO with documentation from a study conducted in Nogales, Arizona, that evaluated the impact of deployed technology in relation to performance metrics and has requested closure of the recommendation. CBP sent a final response to GAO on June 5, 2018. USBP still is coordinating in its ESD on the report function. USBP has developed multiple ways to track technical assists in the Enforce (e3) system and the Tracking and Sign Cutting Modeling system. Additionally, USBP has developed a tool to quantify better contributions of surveillance technologies to its border security efforts. This document serves as the current process in which USBP determines how technology is deployed/tracked with the timeline for the remaining implementation.
USBP	GAO-15-521 (rec 4)	To better ensure that DHS complies with TVPRA [Trafficking Victims Protection Reauthorization Act of 2008] requirements for training, screening, and transferring UAC to HHS [the Department of Health and Human Services], we recommend that the Secretary of Homeland Security direct the Commissioner of U.S. Customs and Border Protection [CBP] to develop and implement guidance on how Border Patrol agents and OFO [Office of Field Operations] officers are to implement the TVPRA requirement to transfer to HHS all Canadian and Mexican UAC who are victims of a severe form of trafficking in persons.	CBP continues to address the recommendation. CBP Office of Policy updated the Form 93. With the revised Form 93 now issued, CBP's OFO and USBP, in consultation with CBP's Office of Chief Counsel (OCC) and Office Training and Development (OTD), will collaborate to develop, deconflict, and revise training consistent with requirements under TVPRA, specifically outlining rules to identify and screen unaccompanied alien children (UAC). This training will emphasize the importance of: (1) properly identifying a juvenile as a UAC, (2) processing for appropriate removal proceedings for a UAC, and (3) if the UAC is from a contiguous country,

OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
			when that UAC may be permitted to withdraw his or her application for admission or voluntarily return. TVPRA training will address the notification timeline further, transfer the process to HHS, and properly record previously stated factors and the overall care given to the UAC.
OFO	GAO-15-521 (rec 1)	To better ensure that DHS complies with TVPRA requirements for training, screening, and transferring UAC to HHS, we recommend that the Secretary of Homeland Security direct the Commissioner of U.S. Customs and Border Protection to develop and implement TVPRA training for OFO officers at airports who have substantive contact with UAC.	CBP OFO no longer is pursuing a separate train-the-trainer course for CBP officers at air ports of entry (POE). The new course in development is a collaborative effort between OFO and USBP, in consultation with OCC, and in partnership with OTD, to develop, deconflict, and revise training consistent with requirements under the TVPRA, specifically outlining rules to identify and screen UAC. This training will emphasize the importance of: (1) properly identifying a juvenile as a UAC, (2) processing for appropriate removal proceedings for a UAC, and (3) if the UAC is from a contiguous country, when that UAC may be permitted to withdraw his or her application for admission or voluntarily return. TVPRA training will address the notification timeline further, transfer the process to HHS, and properly record previously stated factors and the overall care given to the UAC.
USBP	GAO-15-521 (rec 5)	To better ensure that DHS complies with TVPRA requirements for training, screening, and transferring UAC to HHS, we recommend that the Secretary of Homeland Security direct the Commissioner of U.S. Customs and Border Protection to ensure that Border Patrol agents document the basis for their decisions when assessing screening criteria related to (1) an unaccompanied alien child's ability to make an independent	CBP continues to address the recommendation. CBP Office of Policy collaborated with USBP, as well as the CBP OCC and OFO to update the Form 93 to capture the required information. This screening tool provides a mechanism for officers and agents to screen UAC consistently and thoroughly. This tool contains sections relating to the UAC's fear of return to their country

OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
		decision to withdraw his or her application for admission to the United States, and (2) whether UAC are victims of a severe form of trafficking in persons.	of nationality or last habitual residence as well as indicators of human trafficking. For UAC who are nationals or habitual residents of a contiguous country, it also addresses the UAC's ability to make an independent decision to withdraw their application for admission. This form's use is consistent with the requirements of TVPRA. With the revised Form 93 now issued, USBP can begin to code its database to capture the updated information from the Form 93.
USBP	GAO-15-521 (rec 3)	To better ensure that DHS complies with TVPRA requirements for training, screening, and transferring UAC to HHS, we recommend that the Secretary of Homeland Security direct the Commissioner of U.S. Customs and Border Protection to provide guidance to Border Patrol agents and OFO officers that clarifies how they are to implement the TVPRA requirement to transfer to HHS all Mexican UAC who have fear of returning to Mexico owing to a credible fear of persecution.	CBP continues to address the recommendation. CBP Office of Policy updated the Form 93, in accordance with recommendation 2. With the revised Form 93 now issued, CBP OFO and USBP, in consultation with CBP OCC and OTD, will collaborate to develop, deconflict, and revise training consistent with requirements under TVPRA, specifically outlining rules to identify and screen UAC. This training will emphasize the importance of: (1) properly identifying a juvenile as a UAC, (2) processing for appropriate removal proceedings for a UAC, and (3) if the UAC is from a contiguous country, when that UAC may be permitted to withdraw his or her application for admission or voluntarily return. TVPRA training will address the notification timeline further, transfer the process to HHS, and properly record previously stated factors and the overall care given to the UAC.
USBP	GAO-17-66	The Chief of Border Patrol should strengthen the methodology for calculating recidivism such as by using an alien's apprehension history beyond one fiscal year and excluding aliens for whom there	CDS-PMO has started to include the national multiple year recidivism rate in its quarterly power points that are sent to the sectors. USBP continues to work with GAO to provide further

OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
		is no record of removal and who may remain in the United States	information to close out the recommendation.
USBP	GAO-17-66	The Chief of Border Patrol should revise CDS guidance to ensure consistent and accurate methodologies for estimating Border Patrol costs across consequences and to factor in, where appropriate and available, the relative costs of any federal partner resources necessary to implement each consequence	The costs associated with federal partners is not included in the CDS-PMO's cost of apprehension factor, as it does not impact USBP resources. CDS is a USBP specific program designed to analyze costs incurred by USBP from the time of processing to the time the alien is no longer in USBP's custody. During the annual reevaluations, USBP sector personnel stated that they do not include consequence costs applied by other agencies. CBP has submitted documentation for closure of this recommendation.
OFO	GAO-16-646SU/ GAO-17-216	To better ensure the effectiveness of CBP's predeparture programs, we recommend that the Commissioner of U.S. Customs and Border Protection develop and implement a system of performance measures and baselines to evaluate the effectiveness of CBP's predeparture programs and assess whether the programs are achieving their stated goals.	CBP OFO has undertaken a number of steps to act upon the recommendations in the referenced January 2017 GAO Report. OFO assembled a working group, comprising senior program managers from each of its predeparture and prescreening programs to perform a review of program activities, surveyed all available predeparture/prescreening program-related operational data, and select the data elements that would provide reliable information regarding program execution and performance over time. In October 2017, the working group used these data to formulate three high-level, cross-program performance measures that consolidate this information and incorporate the interdependencies inherent in these programs. In February 2018, OFO began assembling the data elements required to support the fiscal year (FY) 2018 baseline year calculation of the three high-level, cross-program performance measures. OFO has

OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
			initiated the computation process for the three new tracking and reporting measures for activity during FY 2018 covering the period October 1, 2017, through September 30, 2018. OFO estimates this process will be complete by December 31, 2018. Collected data and results will be reviewed with subject matter experts (SME) to identify any outstanding issues relating to accuracy or data reliability.
AMO	GAO-17-152 (rec 1)	Develop and document procedures for Predator B coordination among supported agencies in all operating locations.	CBP continues to address the recommendation. To date, CBP has established a path forward to enhance tasking coordination.
AMO	GAO-17-152 (rec 3)	Provide training to users of CBP's data collection system for Predator B missions.	CBP continues to address the recommendation and, to date, has completed the following milestones: developing a schedule for Air and Marine Operations (AMO) Headquarters personnel to conduct training at each Predator B location.
AMO	GAO-17-152 (rec 2)	Update and maintain guidance for recording Predator B mission information in its data collection system.	CBP continues to address the recommendation and, to date, has completed the following milestones: began updating its system of record to record Predator B mission data; and developed a phased approach to disseminate guidance as new functionality is incorporated into the system.
USBP	GAO-17-167SU / GAO-17-331	Develop and implement written guidance to include roles and responsibilities for the steps within its requirements process for identifying, funding, and deploying tactical infrastructure assets for border security operations.	CBP developed the USBP risk management process with six stages that help establish requirements: strategic guidance, mission analysis, planning, execution, assessment, and lifecycle management; conducted a baseline analysis that provided greater ability to consider all solutions for comprehensive border security analysis. USBP Operational Requirements Management Division and Planning and Measures Division coordinated work on establishing

OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
			measures that gauge our impedance and denial as part of Operational Control (OPCON). The measures taxonomy that was created looks at USBP's ability to impede or deny illegal border crossings. In June USBP established the initial measures framework for impedance and denial within the taxonomy and traveled to San Diego Sector to brief local leadership and two stations, Imperial Beach and Brownfield, for feedback on the measures. Both stations believed that the impedance and denial measures were applicable and an appropriate way to measure impedance and denial capability. The internal operating procedures have been completed and issued. CBP has submitted documentation for closure of this recommendation.
USBP	GAO-17-167SU / GAO-17-331	Develop metrics to assess the contributions of pedestrian and vehicle fencing to border security along the southwest border using the data Border Patrol already collects and apply this information, as appropriate, when making investment and resource allocation decisions.	CBP continues to address the recommendation. USBP is implementing the OPCON framework across all Southwest Border (SWB) sectors, allowing USBP to develop baseline values for OPCON for all SWB line stations. The framework is composed of three elements: impedance and denial; situational awareness; and response and resolution. To date, CBP has established an initial taxonomy for impedance and denial, established an initial taxonomy methodology, conducted a pilot, analyzed pilot results, and briefed USBP leadership on the results. CBP will begin to conduct OPCON framework implementation in additional sectors.

OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
AMO	GAO-17-205SU & GAO-17-474 (rec 3)	That the Secretary of Homeland Security direct the Commissioner of CBP to assess and document how the alternative technological solutions being considered will fully meet operational needs related to ultralight aircraft.	CBP continues to address the recommendation. To date, CBP has developed the necessary DHS requirements documentation and conducted a geospatial radar coverage analysis.
AMO	GAO-17-205SU & GAO-17-474 (rec 5)	That the Secretary of Homeland Security direct the Commissioner of CBP to establish and monitor performance targets related to ultralight aircraft.	CBP continues to address the recommendation and, to date, has completed the following milestones: implemented an internal collaborative effort to develop a joint AMO and USBP performance measure and targets for interdicting ultralight aircraft.
USBP	GAO-17-205SU & GAO-17-474 (rec 2)	That the Secretary of Homeland Security direct the CBP-U.S. Immigration and Customs Enforcement [ICE] tunnel committee to convene and establish standard operating procedures [SOP] for addressing cross-border tunnels, including procedures for sharing information.	<p>CBP continues to address the recommendation. To date, CBP has continued to implement existing procedures that support this recommendation; continued enhancing relationship with ICE; and began review of SOPs to identify areas of improvement.</p> <p>USBP is looking actively for standardization opportunities for the tunnel threat environment. This will create opportunities to focus on the processes of detection, interdiction, mapping, and remediation of cross-border tunnels. The first standardization on which USBP is focusing is training. USBP Headquarters is detailing an SME from the Tunnel Patrol Group at Nogales Station to the USBP HQ Training Group. This agent will be compiling the first-ever Tunnel Identification Class. USBP is working with the USBP Basic Academy to have this class included (upon completion) in the Post Academy Training for all Border Patrol agents. This will ensure that all new agents get consistent training</p>

OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
			on indications of tunneling activity and actions to take when the activity is observed. USBP is working with the CBP Advanced Training Center to ensure that this class will be available to all current Border Patrol agents. (b)(7)(E)

OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
			(b)(7)(E)
			(b)(7)(E) Recently, a second Assistant Chief position was added to the USBP Headquarters Tunnel Group. This will create the opportunity for more coordination with ICE at the Headquarters level regarding cross-border tunnel interdictions and investigations.
OFO	GAO-17-419SU (rec 1)	Enforce the 10+2 rule requirement that carriers provide container status messages (CSM) to CBP when targeters identify CSM noncompliance.	On April 12, 2018, CBP published a final rule titled, "Definition of Importer Security Filing Importer," in the Federal Register (83 FR 15736). The final rule broadened the definition of Importer Security Filing (ISF) Importer for foreign cargo remaining on board (FROB) shipments to include nonvessel operating common carriers (NVOCC), immediate exportation (IE), transportation and exportation (T&E) in-bond cargo, and foreign trade zone (FTZ) cargo (ISF-5 filings). The broader definition of ISF Importer generally removes the ambiguity that existed in the previous regulatory language with regard to who is responsible for certain ISF-5 filings. This clarification allows CBP to enforce the requirements of the ISF rule comprehensively. The ISF rule requires importers and vessel-operating carriers to provide additional advance trade data on cargo shipments to CBP generally prior to vessel lading, pursuant to Section 203 of the Security and Accountability for Every Port Act of 2006 and Section 343(a) of the Trade Act of 2002.

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			<p>OFO/Cargo and Conveyance Security (CCS)/Manifest and Conveyance Security Division has worked with Enterprise Services (ES)/Office of Information and Technology (OIT) to explore the development of CSM to the trade community/carriers and the corresponding technical requirements. To create the CSM messages would involve complex programing and funding to do so. In addition, the CSMs would cause confusion and could result in more than a billion messages. The ports have the authority to enforce CSM, and the current plan is for OFO/CCS to remind the ports to do so and to provide guidance. OFO/CCS has drafted an updated CSM enforcement memo to reiterate guidance to field personnel. The memo was issued to the field in June 2018. As with the ISF-10 enforcement, CBP will take a common-sense and phased approach to enforcement. (b)(7)(E)</p> <p>(b)(7)(E)</p> <p>(b)(7)(E) Ports also will be reminded that liquidated damages claims and other enforcement actions against carriers for Vessel Stow Plan and Container Status Message violations are authorized.</p>
OFO	GAO-17-419SU (rec 2)	Evaluate the Importer Security Filing (ISF) enforcement strategies used by Advance Targeting Units (ATU) to assess whether particular enforcement methods could be applied to ports with relatively low submission rates.	<p>In conjunction with the OFO, (b)(7)(E)</p> <p>(b)(7)(E) ISF enforcement strategies are discussed in the monthly ATU calls with the POEs so that best practices may be shared and</p>

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			<p>developed further. On April 12, 2018, CBP published a final rule titled, "Definition of Importer Security Filing Importer," in the Federal Register (83 FR 15736). The final rule broadened the definition of ISF Importer for FROB shipments to include NVOCCs, and IE, T&E in-bond cargo, and FTZ cargo (ISF-5 filings). The broader definition of ISF Importer generally removes the ambiguity that existed in the previous regulatory language with regard to who is responsible for certain ISF-5 filings. This clarification allows CBP to enforce the requirements of the ISF rule comprehensively. The ISF rule requires importers and vessel-operating carriers to provide additional advance trade data on cargo shipments to CBP generally prior to vessel lading, pursuant to Section 203 of the Security and Accountability for Every Port Act of 2006 and Section 343(a) of the Trade Act of 2002.</p> <p>OFO CCS has drafted an updated CSM enforcement memo to reiterate guidance to field personnel. The memo was issued to the field in June 2018. Ports were reminded that liquidated damages claims and other enforcement actions against carriers for Vessel Stow Plan and Container Status Message violations are authorized. Moving forward, liquidated damages claims for ISF violations will be initiated no later than 90 days from the date of discovery of the violation, except in instances furthering the development of criminal cases. Enforcement of the ISF-5 requirements through liquidated damages claims will begin no sooner</p>

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			than November 14, 2018, 6 months from the effective date of the rule. Ports also will be reminded that liquidated damages claims and other enforcement actions against carriers for Vessel Stow Plan and Container Status Message violations are authorized.
OFO	GAO-17-419SU (rec 3)	Identify and collect additional performance information on the impact of the 10+2 data, such as the identification of shipments containing contraband, to better evaluate the effectiveness of the 10+2 program	The OFO Directorates of CCS and NTC-C are collaborating on a plan to assess additional performance metrics to evaluate the effectiveness of the ISF program. CCS will work with the NTC-C to analyze the data from a targeting standpoint to evaluate the program for the following performance areas. They are: 1) identify the number of unmanifested containers and determine how/if they were mitigated before arrival; 2) determine the number of times that CTPAT companies were identified as ISF entity and given targeting benefits, but did not receive the same treatment because of manifest information; and 3) identify the number of times potential terrorism matches were made against ISF entities versus the number of times not matched using the same manifest data.
USBP	GAO-17-66 (rec 2)	The Chief of Border Patrol should collect information on reasons agents do not apply the CDS [Consequence Delivery System] guides' Most Effective and Efficient consequences to assess the extent that agents' application of these consequences can be increased and modify development of CDS guides, as appropriate.	CBP continues to address the recommendation and, to date, has completed the following milestones: Members of the CDS Program Management Office recently completed the annual CDS reevaluations. SMEs and sector command staff were asked to provide reasons for CDS guide deviation. Reasons provided included processing guidelines, reliance on strategic partnerships, and processing timelines. All interviewed agreed that

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			mandatory guide usage was not a realistic or achievable option.
OC-OPR	GAO-17-605SU and GAO-18-72	(FOUO/LES) Update the Security Policy and Procedures Handbook to include the Interagency Security Committee's (ISC) Risk Management Process for Federal Facilities Standard to assess all undesirable events (including three cyber-related threats), consider all three factors of risk, and document deviations from the standard.	The Physical Security Policy and Procedures Handbook (PSPPH) was disseminated for agencywide review and comment on September 30, 2018. Office of Professional Responsibility (OPR) expects to publish the final, signed version by June 30, 2019.
OC-OPR	GAO-17-605SU and GAO-18-72	Update the Security Policy and Procedures Handbook: Include data to include data collection and analysis requirements for monitoring the performance of its physical security program.	The PSPPH was disseminated for agencywide review and comment on September 30, 2018. OPR expects to publish the final, signed version by June 30, 2019.
OC-OPR	GAO-17-605SU and GAO-18-72	Revise the plan's [plan to eliminate the backlog of facility risk assessments] assumptions to balance assessments with competing priorities, such as updating the policy manual and reviewing new construction design, to develop a feasible timeframe for completing the assessment backlog.	CBP/OPR/ Security Management Division successfully has completed risk assessments of all CBP-owned facilities (minus the two under construction). As such, they are now on a cycle to be completed per the ISC standards. CBP has submitted documentation for closure of this recommendation.
OFO	GAO-17-606	CBP to, in conjunction with USPS [U.S. Postal Service], (1) establish measureable performance goals for pilot programs and (2) assess the performance of the pilots in achieving these goals.	In relation to USPS developing a solution to present to CBP-targeted international mail, USPS has agreed that the presentment rate of all CBP-targeted mail going forward will be at (b)(7)(E)

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			(b)(7)(E)
			<p>In April 2018, CBP and USPS exchanged data covering the month of February 2018 for the purpose of comparing presentment rates. On May 3, 2018, CBP and USPS completed their respective reviews of the data and met to discuss findings. These finding revealed a difference of approximately 9 percent between CBP and USPS relative to the presentment rates. Discussions revealed differences in counting methodology, which could contribute to this delta. CBP and USPS agreed to look into the following identified factors that may have contributed to these differences: 1) USPS will check for updated scans in their Product Tracking and Reporting system (scanning and tracking events) and review their list with Inspection Service daily logs; and 2) CBP will have its port to review the list of mail items placed on hold and to make appropriate updates in its Automated Targeting System/Cargo Enforcement Reporting and Tracking System (CERTS) to reflect item had been examined and released. This will ensure more timely coordination between the input to the USPS Global Business System and the CBP Automated Targeting System. In relation to the development of an electronic tool to assist international mail facility (IMF) staff in managing international mail, CBP continues to work with OIT on the development of an International Mail Dashboard to assist in the tracking of CBP targeting</p>

OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
			activity at each IMF. This will allow CBP to compare and confirm presentment rates provided by the USPS in order to assess the performance of the mail pilots.
OFO	GAO-17-606	CBP to, in conjunction with USPS, evaluate the relative costs and benefits of collecting electronic advance data for targeting mail for inspection	CBP OFO CCS continues to work with the Economic Analysis Branch, Regulations and Rulings (EIAB) for additional guidance to address this recommendation. At a meeting between CCS and EIAB on February 2, 2018, it was determined that, because of previously scheduled assignments, EIAB would not be able to provide assistance to CCS prior to April 1. On April 17, 2018, CCS met with EIAB to provide an overview of the processing by CBP of inbound mail at the IMFs. EIAB subsequently provided a list of 21 questions/requests for additional information to assist in developing its analysis. On April 30, 2018, CCS provided a response to EAIB to address several of questions. Some of the information requested is required from the field and USPS. CCS has requested this information and is awaiting responses. CCS and USPS have provided respective responses to each of the 21 EAIB questions/requests. EAIB is in the process of reviewing these responses and subsequently has reached back to USPS for clarification on some of the information provided.
OS-LSSD	GAO-17-774SU, GAO-18-214	(U//FOUO-LSS) Develop a monitoring system to help ensure that CBP officials comply with license verification policies and procedures.	CBP's Weapons of Mass Destruction Division (WMDD) has been realigned (operationally) from the Office of Intelligence (OI) to Laboratories and Scientific Services (LSS) within Operations Support (OS). Accordingly, LSS now has responsibility for Recommendations 1 and 3.

OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
			<p>LSS, in coordination with OFO and OT, will conduct an analytical study to develop a risk matrix and statistically valid sample size to verify companies' compliance with the NRC regulation. CBP will use the results of the analytical study to frame the monitoring system. Directive 5290-015B will be updated to include the addition of a monitoring process to ensure compliance with mandated license verification policies and procedures.</p> <p>CBP, using the results of the analytical study and a risk-based layered approach, will identify</p> <p>(b)(7)(E)</p>
OS-LSSD	GAO-17-774SU, GAO-18-214	Develop a robust system that identifies shipments of radiological material that pose the greatest risk and revise CBP's policies and procedures as necessary to verify licenses for these shipments.	<p>CBP's Weapons of Mass Destruction Division (WMDD) has been realigned (operationally) from the Office of Intelligence (OI) to Laboratories and Scientific Services (LSS) within Operations Support (OS). Accordingly, LSS now has responsibility for Recommendations 1 and 3.</p> <p>LSS, in coordination with OFO and OT, will conduct an analytical study to develop a risk matrix and statistically valid sample size to verify companies' compliance with the NRC regulation. CBP will use the results of the analytical study to frame the monitoring system. Directive 5290-015B will be updated to include the addition of a monitoring process to ensure compliance with mandated</p>

OFFICE	AUDIT	RECOMMENDATION	STATUS (AS OF OCTOBER 1, 2018)
			license verification policies and procedures. CBP, using the results of the analytical study and a risk-based layered approach, will identify shipments that are high risk or may pose a high risk (b)(7)(E) (b)(7)(E)
ES-OFAM	GAO-18-11	The Commissioner of CBP should develop and implement a policy and related guidance for documenting arrangements with landowners, as needed, on Border Patrol's maintenance of roads it uses to conduct its operations, and share these documented arrangements with its sectors.	Facilities Management and Engineering Office (FM&E) and USBP collaborated on the development of new processes, adapting existing guidance to current organizational needs, and utilized lessons learned to make the guidance successful for the organization. The updated policy defines coordination with landowners, where landowner agreements will be stored, POCs for questions, and procedures associated with the coordination with landowners for road maintenance. Additionally, recurring calls with the real estate and environmental team, USBP headquarter representative, Sector representatives, and program management have been developed to ensure transparent and clear communication of requirements, clearance status, and upcoming contract activities. The Real Property Requirements Management Policy was finalized on July 31, 2018.
USBP	GAO-18-11	The Commissioner of CBP should clearly document the process and criteria for making decisions on funding non-owned operational requirements and communicate this process to Border Patrol sectors.	The USBP and FM&E team is finalizing the process for maintenance and repair of roads and have draft guidance for the field that has not been finalized. USBP and FM&E will work to complete the process by the end of October 2018. USBP and FM&E developed the first iteration of

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			a prioritization process that was deployed as a pilot for prioritization of FY 2018 new roads. Through collaborative meetings and in coordination with the field, they identified key best practices and developed a prioritization process that considers three pillars: qualitative, quantitative, and feasibility. Through the pilot, sectors prioritized their new road requirements and tied those requirements back to their capability gap analysis submissions by referencing a core-card for each requirement. The criteria were developed and leveraged from best practices used at the sectors and after the Border Wall Decision Support Tool. Through this pilot, USBP was able to compile each sector's top new road requirements for national prioritization at USBP Headquarters. As of August 11, 2018, USBP and Office of Facilities and Asset Management are continuing work on refining the prioritization methodology and will be expanding it to prioritizing maintenance and repair requirements. A prioritization tool and guidance are in draft.
USBP	GAO-18-11	The Commissioner of CBP should assess the feasibility of options for addressing the maintenance of nonfederal public roads. This should include a review of data needed to determine the extent of its reliance on non-owned roads for border security operations.	The USBP and FM&E team is finalizing the process for maintenance and repair of roads and have draft guidance for the field that has not been finalized. USBP and FM&E will work to complete this process by the end of October 2018.
OS-LSSD	GAO-18-205	The Commissioner of CBP should, in consultation with the Executive Director of CBP's LSSD and the Laboratory Directors, assess volume and risk at each port of entry to determine those with the greatest need for resources, use this information as a basis for staff allocations, and document its risk-based, staff allocation process to	CBP continues to address the recommendation. LSS has been engaged fully with OFO at the (b)(7)(E) (b)(7)(E) (b)(7)(E) providing daily onsite scientific and forensic support through (b)(7)(E) LSS, in

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		ensure that CBP and LSSD priorities can be accomplished as effectively and efficiently as possible.	coordination with OFO, is now assessing (b)(7)(E) to evaluate the impact of (b)(7)(E) (b)(7)(E) and to determine the best utility and allocation of LSS resources at (b)(7)(E) (b)(7)(E) A draft report of findings and recommendations will be completed by November 9, 2018. On October 1, 2018, LSS activated the 24/7 Narcotics Reachback Center for presumptive analysis and technical advice. Additionally, the (b)(7)(E) at the LSS (b)(7)(E) activated on October 1, 2018. LSS is working closely on a risk model to inform resource allocations and anticipates the completion of a draft model by November 9, 2018. Final assessments and evaluations from site visits, discussions, and (b)(7)(E) are progressing and will be concluded by November 9, 2018, with a draft report of findings and recommendations for resource allocations.
Trade	GAO-18-271	The Secretary of Homeland Security should ensure that the Commissioner of CBP, in collaboration with partner agencies, finalizes an interagency approach to the post-core management of ACE [Automated Commercial Environment] that includes (1) processes for prioritizing enhancements to ACE and for sharing ACE operations and maintenance and development costs, including the costs of suggested enhancements among partner agencies that may benefit, and (2) time frames for implementing such processes.	CBP, in collaboration with partner agencies, finalized an interagency approach to the post-core management of ACE. The Border Interagency Executive Council (BIEC) finalized the ACE PAYGO Model; a cost-sharing model and prioritization process for all ACE Single Window enhancements, identified as the “Single Window Sustainment (SWS) Planned Pay-As-You-Go Model.” The approved SWS Planned PAYGO Model and associated prioritization process has been implemented fully. The BIEC has conducted two

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			<p>successful prioritization sessions, prioritizing a total of 26 Requests for Development (RFD). Prioritization sessions will continue for the remaining RFDs quarterly.</p> <p>CBP considers the GAO recommendation mitigated and completed because the process has been approved by the BIEC and has been implemented fully. CBP has submitted a request for closure to GAO.</p>
ES-OA	GAO-18-489SU, GAO-18-614	Analyze the costs associated with future barrier segments and include cost as a factor in the Impedance and Denial Prioritization Strategy	On September 26, 2018, CBP provided the signed approved documentation from the Border Wall System Program Annex B Excursion 1 for the secondary barrier for the San Diego Sector to GAO, and noted that it is Annex B, not Appendix B, as noted in the July update. CBP considers this action to be completed, and requested that GAO consider this recommendation resolved and closed, as implemented.
ES-HRM	GAO-18-487	Commissioner of CBP should ensure that its operational components systematically collect and analyze data on departing law enforcement officers and use this information to inform retention efforts.	CBP agrees that high-quality exit survey data are essential to support and inform retention efforts. In May 2018, CBP's Office of Human Resources Management formed a workgroup tasked with the development of custom questions for a CBP-wide exit survey. The workgroup comprised representatives from across the agency, which included the Office of the Commissioner, OFO, USBP, AMO, OT, OS, Enterprise Services, Congressional Affairs, OPR, and the Office of Public Affairs. The workgroup initially reviewed the USBP-specific exit survey as the foundation for the CBP-wide exit survey. They also considered employee exit survey research and

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			<p>CBP office-specific information needs. The survey was launched on August 17, 2018.</p> <p>POCs were established across CBP in each office to assist in communicating the launch of the new survey. The POCs are available to answer any questions from supervisors or exiting employees about the survey. On September 10, 2018, an announcement and link to the survey was included in the weekly CBP Central message broadcast across the agency. Immediately following that message, exit survey POCs were encouraged to send an email announcement regarding the launch of the survey to their staff. POC's were provided with sample email language and a guide for supervisors, which detailed all the steps of the off-boarding process so that they could encourage exiting employees to complete the survey.</p> <p>The first announcement of the exit survey response rates were sent to the POCs on October 2, 2018. The response rates were broken out by office. POCs were encouraged to continue messaging about the exit survey in order to increase the response rate. Survey response rates will be sent to the POCs biweekly until further notice.</p> <p>The exit survey working group currently is working on embedding a link to the exit survey on the Separations and Clearance Form, CBP Form 241, in order to facilitate further the easy completion of the exit survey during the off-boarding process. Additional avenues for automation of the off-boarding process currently are being researched, and, if appropriate, more</p>

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			automation of exit survey notifications to exiting employees will be included.
OC-OPR	GAO-18-405	Revise policy or guidance to ensure documentation of required control activities in its case management system, such as legal review of adverse actions, and data verification.	<p>The CBP OPR Investigative Operations Division is in the process of creating and implementing procedures for the use of a Data Verification Checklist for OPR Investigations that will assist OPR in verifying the data contained in the Joint Integrity Case Management System (JICMS) are complete and accurate.</p> <p>As for the legal review of adverse actions, this responsibly falls with the Labor and Employee Relations (LER), within the Office of Human Resources Management (HRM). OCC conducts a legal review of all adverse actions, and LER documents this review in its Human Resources Business Engine (HRBE).</p>
OC-OPR	GAO-18-405	Require staff to document investigative findings (e.g., whether an allegation is substantiated) in the case management system, and document and disseminate associated referral procedures for adjudication.	Currently, OPR investigative findings are documented in OPR's reports of investigation that are uploaded in both JICMS and HRBE. However, under CBP's uniform discipline procedure, the final determination as to whether an allegation is substantiated is a management determination, made after OPR has referred the case to LER for review and action. In HRBE, LER documents the misconduct that the proposing official has determined is actionable, along with the misconduct the deciding official substantiated. OPR will document and disseminate associated referral procedures for adjudication by developing internal protocols establishing when and how cases should be referred to LER for adjudication.
OC-OPR	GAO-18-405	Ensure the appropriate program offices include evaluating and testing internal	OPR and HRM will continue to work with the CBP's Management

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		controls related to the employee misconduct process in CBP's annual self-inspection program.	Inspections Division to develop Self-Inspection Program (SIP) worksheets for inclusion in the FY 2019 SIP cycle to evaluate and test internal controls related to specific roles in the employee misconduct process.
OC-OPR	GAO-18-405	Monitor the duration of all cases beginning-to-end by stage and by case type.	Data that would allow for the monitoring of the duration of all cases beginning-to-end by stage and by case type is maintained in two case management systems, OPR's JICMS and HRM's HRBE. HRBE provides a complete audit trail for each case from date of receipt by HRM to the date of closure and also identifies the stages at each point in the HRBE audit trail. OPR currently is working on the modernization of JICMS that includes a detailed case audit trail for better monitoring of cases beginning-to-end by stage and by case type. Once implemented, OPR will work to relaunch the OPR Executive Dashboard. Because the data needed to monitor all cases beginning-to-end are maintained in two separate systems, OPR and HRM will work together to develop a comprehensive dashboard to monitor the duration of all cases from beginning to end.
OC-OPR	GAO-18-405	Monitor the timeliness of misconduct cases according to established targets for management inquiries, administrative inquiries, and criminal and non-criminal investigations using case management system data.	Monitoring the timeliness of misconduct cases according to established targets for various case types using case management system data is linked to the comprehensive Executive Dashboard discussed in Recommendation #4. Captured data will be used to generate reports allowing OPR Headquarters and local OPR management to review and monitor timeliness. OPR and HRM will work together to ensure that the Dashboard monitors timeliness of misconduct cases.

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OC-OPR	GAO-18-405	Define and document the case management system data fields to be used for monitoring all established performance targets and provide related guidance to staff.	OPR will define clearly the data fields used to measure performance within the Executive Dashboard. Once developed, OPR will provide the appropriate guidance to staff.
OS-PARE	GAO-18-550	The Commissioner of Customs and Border Protection through the Executive Assistant Commissioner for Operations Support finalizes and promulgates the Customs and Border Protection's draft policy for requirements development.	CBP OS Capabilities and Requirements Division's (CRD) Operational Capabilities and Requirements Development Directive is complete and was signed by the Deputy Executive Assistant Commissioner (D/EAC), OS on October 11, 2018. The OS D/EAC is an authorized representative of the Component Requirements Executive as outlined in the Component Requirements Executive Delegation Order dated January 3, 2018.
OS-PARE	GAO-18-550	The Commissioner of Customs and Border Protection through the Executive Assistant Commissioner for Operations Support updates the 2013 workforce assessment to account for the independent requirements organization's current workforce needs.	The Commissioner of CBP, through the Executive Assistant Commissioner for OS, updates the 2010 workforce assessment to account for the independent requirements organization's current workforce needs. The workforce assessment was reviewed and approved on October 11, 2018 by the Executive Director, Planning Analysis Requirements & Evaluation Directorate, OS (OS/PARE). The Executive Director OS/PARE is an authorized representative of the Component Requirements Executive as outlined in the Component Requirements Executive Delegation Order dated January 3, 2018.
OS-PARE	GAO-18-550	The Commissioner of Customs and Border Protection through the Executive Assistant Commissioner for Operations Support establishes component specific training for requirements development.	CBP's CRD completed the first working-level training course on March 12-16, 2018, the second on April 30-May 4, 2018, and the third on June 18-22, 2018. A fourth course was delivered as specific modules on Capability Analysis Reports and Operational Requirements Documents (vice the entire week-long

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			curriculum) based on the needs of the Agency at the time. CRD also currently is condensing the curriculum for delivery at the Executive Level. We request that GAO consider this recommendation resolved and closed, as implemented. August 2018 Update: The course development concluded, and CRD has executed multiple iterations. CRD also has started a rolling curriculum addressing specific segments of the training in 1.5-2 hour blocks. This delivery method initially targeted internal CRD resources, but was made available to a broader CBP audience beginning in September 2018. CBP considers this recommendation completed and has requested closure.

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OFFICE OF INSPECTOR GENERAL REPORTS

OFFICE	AUDIT	RECOMMENDATION	STATUS
USBP	OIG-12-132	The OIG recommends that the Chief, U.S. Border Patrol complete the planned Concept of Operations document describing how the identified capabilities need to function from a cross-component perspective to support the Analysis of Alternatives for the Tunnel Detection and Technology Program.	CBP continues to address the recommendation and, to date, has completed the following milestones: USBP is working toward the creation of a draft operational requirements document to detect capability gaps for the Cross-Border Tunnel Threat (CBTT) program. This draft document will be used to support the analysis of alternatives, which has been paused temporarily. The CBTT integrated master schedule provides that the concept of operations is complete and is in the review/signature cycle. Once the necessary signatures are obtained, it will be submitted to the Joint Requirements Council (JRC), which has 20 days to review and comment. If changes are recommended, CBTT has 10 days to respond and return them to the JRC. Barring any unforeseen circumstances, the process will be completed by November 30, 2018.
OS-LESC	OIG-13-114	Develop a formal process to evaluate use of force training field audit results and follow up on field audit recommendations.	CBP has addressed the recommendation. CBP completed FY 2018 visits to the field; finalized the development of an automated process that allows CBP management to evaluate use of force training audit results and follow up on field audit recommendations; and developed a requirements document specifying the capabilities and functionality of the SharePoint site and forms.
USBP	OIG-17-114	Chief of the U.S. Border Patrol, in collaboration with the Assistant Commissioner for OIT: Complete modernization plans for the e3 system to ensure adequate availability and functionality to support border security mission needs	USBP included the modernization plan in the Border Patrol Enforcement System (BPES) narrative for the FY19 Business Case. Additionally, USBP estimated initial Fiscal Year 2018 funding requirements for preliminary modernization planning. USBP is on track to identify and develop key artifacts to support Joint Requirements Council (JRC) requirements. USBP

OFFICE	AUDIT	RECOMMENDATION	STATUS
			will work with the CBP, Office of Acquisition to schedule an Acquisition Decision Event (ADE) – 1 for the BPES Modernization by December 31, 2018. The USBP Enforcement Systems Division (ESD) completed the Capability Analysis Study Plan (CASP) in November 2017, and finished the Capability Analysis Report (CAR) in April 2018. The document is currently working through CBP channels to the DHS JRC. The ESD has completed the p-MNS for internal CBP review. The ESD will complete the p-CONOPS by October 31, 2018.
ES-OFAM	OIG-17-115-MA	CBP promptly upgrade the infrastructure at Tucson Sector stations and ensure Border Patrol agent safety by providing the resources necessary to correct the urgent physical security issues.	CBP continues to address the recommendation; (b)(7)(E)
ES-OFAM	OIG-17-115-MA	CBP review the security policy and procedures at Border Patrol stations and CBP facilities in the Tucson Sector to (b)(7)(E)	CBP continues to address the recommendation; (b)(7)(E)
ES-OIT	OIG-18-19	Ensure that the TECS test environment is sufficiently similar to the TECS production environment so that testing scenarios will be able to identify errors caused by processing a large volume of queries.	(b)(7)(E) are projected for completion by March 31, 2019. CBP is in the process of pursuing two like-for-like direct leases by December 31, 2018. The leases will address additional or changed security improvements.
ES-OIT	OIG-18-19	Ensure that the TECS test environment is sufficiently similar to the TECS production environment so that testing scenarios will be able to identify errors caused by processing a large volume of queries.	CBP continues to address the recommendation. To date, CBP has completed the TECS system assessment of the current architecture and finalized the cloud infrastructure for a representative TECS system to include a test environment.

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ES-OIT	OIG-18-19	Provide the DHS Chief Information Officer [CIO] with a weekly status of CBP's planned and actual modernization migration schedule and milestones detailing when (a) the Legacy mainframe environment is no longer needed, and (b) the recovery site is fully functional.	CBP continues to address the recommendation as it continues to report status information to the DHS CIO via the INVEST report. Reporting will continue although legacy mainframe environment no longer is needed.
OC-OPR	OIG-18-18	CBP should update the Special Agent Internal Operating Procedures immediately to reflect the guidance on the use of Section 1509 Summonses provided in the May 25, 2017 email referenced in this report from the Executive Director of CBP OPR's Investigative Operations Division.	The Internal Operating Procedures Chapter to reflect the guidance on the use of Section 1509 Summonses was drafted and submitted to OCC for review and clearance. It is pending return from OCC.
OC-OPR	OIG-18-18	The relevant CBP personnel should receive training on the proper use of Section 1509 Summonses as soon as practicable.	The training materials on the use of Section 1509 Summonses were drafted and submitted to OCC for review and clearance. The materials are pending return from OCC.
OC-OPR	OIG-18-18	CBP should look at use of Section 1509 Summonses across the agency to determine how such summonses are being used, and whether such uses comport with the law and CBP's updated policy.	The responses received from components on the use of the Section 1509 Summonses were sent to the OCC for review. OCC completed its review, and documentation was submitted to request closure of this recommendation.
OC-OPR	OIG-18-68	Develop and implement a formal policy for the complaint review and response process.	CBP OPR conducted a comprehensive internal review of the processes and procedures utilized to review and respond to polygraph complaints. The review confirmed the need for a comprehensive policy, which formalized the manner in which the agency addresses complaints about polygraph exams. Following the review, CBP OPR developed a policy, which addresses all facets of the complaint review and response process. It provides the required level of oversight while ensuring reviews and responses are conducted in an

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			<p>efficient, objective, and thorough manner.</p> <p>On August 13, 2018, OPR implemented the “Standard Operating Procedures: Responding to Polygraph Exam Complaints,” formalizing CBP’s polygraph complaint review and response process. Additionally, to provide increased public visibility and transparency of the complaint process, OPR added the following questions and answers to the frequently asked questions’ polygraph portion of CBP’s public facing website (https://www.cbp.gov/careers/car/poly)</p> <p>On the basis of the above information and the SOPs, OPR has requested closure of recommendation two as well as closure of the OIG’s audit, via the 90-Day Update to the Office of Accountability dated September 19, 2018.</p>
OS-LESC	OIG-18-76	Provide recurring familiarization training on official assault reporting systems.	CBP’s Law Enforcement Officer Safety and Compliance Directorate (LESC) continues to address the milestones to achieve complete implementation of the recommendation. On schedule to complete the implementation plan by December 31, 2018.
OS-LESC	OIG-18-76	Clarify guidance on the types of assaults that must be officially reported, as well as the steps in the reporting process.	CBP LESC continues to work on the milestones to achieve complete implementation of the recommendation. On schedule to achieve a complete implementation by December 31, 2018.
OS-LESC	OIG-18-76	Mandate that law enforcement officers complete refresher training quarterly, including training on individual threat assessments (to include pre-assault recognition), assault mitigation	CBP LESC continues to address the milestones to achieve complete implementation of the recommendation. On schedule to complete the implementation by March 31, 2019.

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		techniques, defensive tactics training, and scenario-based training exercises	
ES-OIT	OIG-18-79	Develop a process for ensuring all information systems are included in the CBP Office of Information Technology inventory, along with notification to the CBP Privacy and Diversity Office when a system is added.	<p>OIT will develop a process for ensuring all information systems are included in the official CBP OIT's Federal Information Security Management Act (FISMA) system inventory.</p> <p>CSD Security Operations Center/Vulnerability Assessment Team will begin tracking rouge assets on the CBP network and will create a dashboard showing detected unauthorized systems. The report will highlight decentralized servers and systems without the Tanium agent.</p> <p>CBP OIT will reach out to CBP's Privacy and Diversity Office to discuss its role and inclusion in the updated FISMA Inventory SOP.</p> <p>CBP OIT will update the FISMA Inventory SOP and will draft memoranda to the CBP community regarding security compliance communication failures in the implementation of "rogue" systems on the CBP network.</p>
AMO	OIG-18-79	Provide a plan, including timelines, for fulfilling supporting requirements and obtaining authorization to operate ISR [intelligence, surveillance, and reconnaissance] Systems.	AMO is developing a number of documents needed to obtain an authorization to operate through the formal CBP Immigration Automated Clearance System process. AMO has a plan of action and milestones (POA&M) that includes the completed privacy threshold analysis for ISR Systems and its System Privacy Plan. The POA&M includes timeframes for obtaining authorization for operating ISR Systems.

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AMO	OIG-18-79	Create and implement a process according to DHS policy for timely installing software patches on the VADER [Vehicle and Dismount Exploitation Radar] and Minotaur systems.	AMO has created a process for timely, 90-day installation of software patches on the VADER and Minotaur systems. To maintain Department of Defense and CBP integrity and current efficiencies, AMO has prepared a request to CBP OIT for approval to implement a timely software patch cycle of 90 days for Minotaur and VADER.
AMO	OIG-18-79	Create and implement a process to update all ISR System subsystems currently running on unsupported operating systems.	AMO has created and implemented a process to update all ISR Systems subsystems currently running on unsupported operating systems. The transition from unsupported legacy software to the supported Minotaur system is programmed to occur.
OFO	OIG-18-80	CBP Executive Assistant Commissioner, Office of Field Operations, take steps to coordinate with airport and airline stakeholders to increase bandwidth to meet the operational demands of biometric processing at the Nation's top airports.	Because CBP is approaching biometric entry-exit implementation in partnership with airline/airport operators' network connectivity is a key topic with regard to implementing the program. Although CBP is not selecting specific hardware or bandwidth requirements, connectivity information is included in Section 2 of the Traveler Verification Service Technical Reference Guide. Given that airports and airlines are beginning to include the use of biometrics in their own business processes (e.g., aircraft boarding), it is in their own interests to ensure adequate connectivity so that they can meet the complex operational demands to ensure timely aircraft departures.
OFO	OIG-18-80	CBP Executive Assistant Commissioner, Office of Field Operations, develop an internal plan to institute enforcement mechanisms or back-up procedures to prevent airlines from bypassing biometric processing prior to flight boarding.	As the biometric air exit capability nears full operational capability, CBP will develop a plan to institute photo capture enforcement mechanisms in partnership with airport and airlines stakeholders. The plan will include operating parameters, SOPs, and an enforcement ramp-up period to allow travelers, airlines, and airports

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			adequate time to adjust operations and ensure compliance with biometric air exit.
OFO	OIG-18-80	CBP Executive Assistant Commissioner, Office of Field Operations, continue to refine the Traveler Verification Service algorithm to ensure the highest possible passenger match rate, with allowances for photo and age quality.	<p>CBP has instituted rigorous process to review data and metrics associated with biometric facial recognition matching performance. Since the completion of the OIG's field work in January 2018, and as of the end of July 2018, CBP has conducted departure operations on more than 3,300 flights with a total of 621,000 passengers; of those travelers' images that were captured at the gate and a photo in the gallery, 97 percent were matched successfully. As a result of CBP's continuous monitoring and incremental improvements to the matching algorithm, CBP data currently do not demonstrate any significant difference in match rate between citizenship, age, or gender. CBP's biometric matching service utilizes a number of tools to minimize and mitigate algorithmic performance including:</p> <ol style="list-style-type: none">1) Use of diverse training sets;2) Matching against a limited set of faces based on the flight, cruise, or border crossing;3) Continuous monitoring for performance; and4) Execution of a variety of statistical tests to bolster performance thresholds and minimize any matching discrepancies. <p>To ensure a high performance of the algorithm further, CBP has partnered with DHS Science and Technology and is currently in the process of partnering with the National Institute of Standards and Technology to perform an independent and comprehensive scientific analysis of CBP's operational</p>

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			<p>face matching performance, including impacts due to traveler demographics and image quality. CBP expects to begin this work no later than December 31, 2018.</p> <p>CBP will continue to monitor actively and refine the performance of the algorithm and associated operational processes in order to make incremental improvements and ensure the high accuracy of facial matching for all travelers, regardless of ethnicity, age, or gender.</p>
OFO	OIG-18-80	CBP Executive Assistant Commissioner, Office of Field Operations, develop internal contingency plans for funding and staffing the program, in the event that airlines do not agree to partner with CBP in implementing the biometric capability nationwide.	<p>The OIG's draft report indicates that collaboration with the private sector is a significant point of failure for the biometrics program; however, CBP believes otherwise. Specifically, CBP's viewpoint is that not collaborating with the private sector is a far greater risk, as evidenced by the lack of biometric exit progress between 2004 and 2014, and further demonstrated by airlines'/ airports' comments and concerns expressed during the 2008 Notice of Proposed Rule Making process, which put the burden of biometric exit squarely onto air carriers. CBP's partnership approach allows CBP to build and maintain a robust traveler identity service ecosystem that enables airports and airlines to approach the biometric exit mandate within their own modernization plans and in a way that meets individual operational nuances. The alternative is a government wholly owned solution that could add layers to an already complex travel environment with limited regard to traveler experience and individual airline/airport facility and operational realities. Since the OIG completed its fieldwork in January 2018, CBP has</p>

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			<p>received eight letters from different airports and airlines committing to implement biometric exit in collaboration with CBP.</p> <p>CBP recognizes that a collaborative approach with the private sector is new, does not necessarily fit into current government acquisition and project management processes, and may present a certain uneasiness with oversight authorities with regard to project schedule and funding. Although CBP is confident that a partnership is the right approach for implementation of biometric exit, CBP will develop an internal contingency plan for funding and staffing the program in case airlines and airports do not partner with CBP.</p>
OFO	OIG-18-83	The Executive Assistant Commissioners for Office of Field Operations and Operations Support conduct an analysis to determine what additional staff, canines, x-ray scanning machines, and hand-held chemical analysis devices are needed to adequately address the threat from opioids arriving daily in the large volume of international mail.	<p>OFO will collaborate with OS to conduct a cost-benefit analysis. The cost-benefit analysis will evaluate and determine additional staffing levels, canine teams, and technology that is necessary to address efficiently and adequately the threat (b)(7)(E)</p> <p>(b)(7)(E)</p> <p>(b)(7)(E) It is important to note that significant equipment upgrades already have been made at the (b)(7)(E) since the OIG's July 2017 audit team visit. For example, as of November 7, 2017, the (b)(7)(E)</p> <p>(b)(7)(E)</p> <p>(b)(7)(E)</p> <p>(b)(7)(E) A permanent narcotics detection and analysis laboratory to replace the temporary</p>

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			laboratory is in the planning stage for the facility.
OFO	OIG-18-83	The Executive Assistant Commissioners for Field Operations and Operations Support assign and dedicate canine teams as appropriate to detect opioids at the international mail facility on a daily basis.	<p>The OFO (b)(7)(E) will work with the OFO Operations Directorate (OPS) to evaluate an increase in the total number of canine narcotic detector teams assigned at the (b)(7)(E).</p> <p>(b)(7)(E) As an interim solution, the (b)(7)(E) and OPS will explore alternatives to commercial kenneling, as a means of enhancing the port's ability to deploy more rapidly available canine teams to address immediate threats of illicit opioids in international mail.</p>
OFO	OIG-18-83	The Assistant Commissioner for the Office of Information and Technology (OIT) and Executive Assistant Commissioners for Field Operations and Operations Support jointly establish a process to inventory arriving international air mail received from USPS, scanned by CBP, and returned to USPS.	<p>OFO, Manifest and Conveyance Security Division, in collaboration with the NII Division, already has identified the need (b)(7)(E) NII equipment with the capacity to address the specific inventory issue as described in the recommendation, as well as (b)(7)(E).</p> <p>The procurement and acquisition process currently is being developed internally.</p>
OFO	OIG-18-83	The Executive Assistant Commissioners for Field Operations and Operations Support update CBP's International Mail Operations and Enforcement Handbook to reflect all types of arriving international mail.	OFO will revise CBP's International Mail Operations and Enforcement Handbook to reflect more fully the current operational conditions in relation to (b)(7)(E) of international mail arriving, increasing volumes of international mail, and the applicability of advance electronic data to (b)(7)(E) inbound international mail.
OFO	OIG-18-83	The Executive Assistant Commissioners for Field Operations and Operations Support perform and document periodic 'Mail Flex' operations, including use of canine teams, to better determine the size and scope of the threat inherent in specific	The OFO (b)(7)(E) collaborating with OFO's National Targeting Center-Cargo, OPS, HSI, U.S. Postal Inspection Services, and state and local law enforcement agencies, to develop and implement (b)(7)(E).

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		classes of mail and form specific countries.	(b)(7)(E)
OFO	OIG-18-83	The Assistant Commissioner for the OIT and the Executive Assistant Commissioners for Field Operations Support jointly establish adequate internal control processes, including maintaining inventories and physically securing suspicious mail that may be seized following additional review.	OFO, (b)(7)(E) in collaboration with Enterprise Services - OIT will develop and deploy an automated technical solution for maintaining an accurate inventory on those segregated international mail items that are subject for further scrutiny, but not yet seized. CBP (b)(7)(E) (b)(7)(E) to ensure (b)(7)(E) (b)(7)(E) parcels prior to seizure. Parcels (b)(7)(E) (b)(7)(E) but not yet seized, are secured immediately upon initial examination in (b)(7)(E) and is equipped with (b)(7)(E) (b)(7)(E) Only personnel assigned to work in the secure space are granted access card privileges.
OFO	OIG-18-83	The Executive Assistant Commissioners for Field Operations and Operations Support jointly update the Seized Asset Management and Enforcement Procedure Handbook and the International Mail Operations and Enforcement Handbook to outline all of the precautions necessary to safeguard suspicious mail prior to formal seizure.	In 19 U.S.C. 1499 § (c)(1), CBP is provided a 5-day period (excluding weekends and holidays) following the date on which merchandise is presented for customs examination, to make informed determinations regarding merchandise releases or detentions. This 5-day period is prior to formal seizure. The Seized Asset Management and Enforcement Procedure Handbook (SAMEPH) references 19 U.S.C. 1499 § (c)(1). OFO will revise the International Mail Operations and Enforcement Handbook to reflect more fully the appropriate operational processes in international mail to account for safeguarding of mail held by CBP prior to formal seizure. The SAMEPH also will be updated to reference the International Mail Operations and Enforcement Handbook for proper

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			procedures governing the handling of these mail items prior to seizure.
ES-OIT	OIG-18-83	The Assistant Commissioner for OIT update CBP's targeting servers with DHS-recommended system configuration management settings or request waivers, as appropriate.	<p>OIT will update CBP's targeting servers with updated Configuration Management (CM) settings developed and defined through implementation of the CBP Enterprise Security Program. Upon completion, OIT will reference any waivers as needed to ensure either the CM settings fully comply with DHS-recommended system settings, or are documented via waivers or other methods.</p> <p>OIT completed documenting the difference between CBP and DHS Security Technical Implementation Plan for Windows 16 via compliance scans conducted by CBP/OIT Security Operations Division.</p>
ES-OIT	OIG-18-83	The Assistant Commissioner for OIT develop a plan with milestones for replacing the noncompliant CCTV system with an inventoried and compliant system.	<p>CBP will develop and implement a plan with milestones for replacing the noncompliant CCTV system with an inventoried and compliant system.</p> <p>OIT installed two new CISCO switches and configured the VLAN for Centralized Area Video Surveillance System (CAVSS) Project on September 21, 2018. The CAVSS installation is complete.</p>